

EXHIBIT 1

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Case No. 15-cv-0023 (CBA) (VMS)

5 -----x
6 DR. JOSEPH WILSON, PhD,
7 Plaintiff,
8 - against -
9 THE STATE OF NEW YORK, et al.,
10 Defendants.

11 -----x
12 January 29, 2019
13 9:30 a.m.

14 DEPOSITION of DR. JOSEPH WILSON,
15 taken by the Defendants, pursuant to
16 Notice, held at the Law Offices of John S.
17 Yong, P.C., 39 East Broadway, New York,
18 New York, before Debbie Zaromatidis, a
19 Shorthand Reporter and Notary Public of
20 the State of New York.

<p style="text-align: right;">Page 2</p> <p>1 2 A P P E A R A N C E S : 3 4 L A W O F F I C E O F J O H N S . Y O N G , P . C . 5 A t t o r n e y s f o r P l a i n t i f f 6 3 9 E a s t B r o a d w a y 7 N e w Y o r k , N e w Y o r k 8 B Y : C H R I S Y O N G , E S Q . 9 - a n d - 10 J A M E S B . K L E I N , E S Q . 11 12 S T A T E O F N E W Y O R K 13 O F F I C E O F T H E A T T O R N E Y G E N E R A L 14 A t t o r n e y s f o r D e f e n d a n t s 15 2 8 L i b e r t y S t r e e t 16 N e w Y o r k , N e w Y o r k 17 B Y : M A R K E . K L E I N , E S Q . 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 W I L S O N 2 D R . J O S E P H W I L S O N , 3 h a v i n g f i r s t b e e n d u l y s w o r n b y a N o t a r y 4 P u b l i c o f t h e S t a t e o f N e w Y o r k , w a s 5 e x a m i n e d a n d t e s t i f i e d a s f o l l o w s : 6 E X A M I N A T I O N B Y M R . K L E I N : 7 Q . G o o d m o r n i n g , D r . W i l s o n . 8 A . G o o d m o r n i n g . 9 Q . H a v e y o u e v e r b e e n d e p o s e d 10 b e f o r e , s i r ? 11 A . N o . 12 Q . Y o u u n d e r s t a n d , s i r , t h a t I ' l l 13 b e a s k i n g y o u a s e r i e s o f q u e s t i o n s t o d a y , 14 a n d y o u a r e r e q u i r e d t o a n s w e r t h o s e 15 q u e s t i o n s u n d e r o a t h . D o y o u u n d e r s t a n d 16 t h a t ? 17 A . Y e s , I d o . 18 Q . A n d d o y o u u n d e r s t a n d t h a t t h e 19 o a t h y o u g a v e t o d a y i s t h e s a m e a s i f y o u 20 w e r e t e s t i f y i n g i n c o u r t ? D o y o u 21 u n d e r s t a n d t h a t ? 22 A . I u n d e r s t a n d t h a t . 23 Q . I f a t a n y t i m e y o u d o n o t 24 u n d e r s t a n d t h e q u e s t i o n t h a t I a s k y o u , 25 p l e a s e t e l l m e , a n d I ' l l d o m y b e s t t o</p>
<p style="text-align: right;">Page 3</p> <p>1 2 S T I P U L A T I O N S 3 4 I T I S H E R E B Y S T I P U L A T E D A N D 5 A G R E E D b y a n d b e t w e e n t h e A t t o r n e y s f o r 6 t h e r e s p e c t i v e p a r t i e s h e r e t o t h a t f i l i n g 7 a n d s e a l i n g b e a n d t h e s a m e a r e h e r e b y 8 w a i v e d . 9 I T I S F U R T H E R S T I P U L A T E D A N D 10 A G R E E D t h a t a l l o b j e c t i o n s e x c e p t a s t o 11 t h e f o r m o f t h e q u e s t i o n , s h a l l b e 12 r e s e r v e d t o t h e t i m e o f t h e t r i a l . 13 I T I S F U R T H E R S T I P U L A T E D A N D 14 A G R E E D t h a t t h e w i t h i n e x a m i n a t i o n m a y b e 15 s i g n e d a n d s w o r n t o b e f o r e a n y n o t a r y 16 p u b l i c w i t h t h e s a m e f o r c e a n d e f f e c t a s 17 t h o u g h s i g n e d a n d s w o r n t o b e f o r e t h i s 18 C o u r t . 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 W I L S O N 2 r e p h r a s e i t , s o t h a t y o u d o . I s t h a t 3 a g r e e d ? 4 A . T h a t i s a g r e e d . 5 Q . I f y o u a n s w e r m y q u e s t i o n , I 6 w i l l a s s u m e t h a t y o u u n d e r s t o o d m y 7 q u e s t i o n . D o y o u u n d e r s t a n d t h a t ? 8 A . I u n d e r s t a n d t h a t . 9 Q . I s t h e r e a n y m e d i c a t i o n t h a t 10 y o u ' r e t a k i n g t h a t w o u l d i n t e r f e r e w i t h 11 y o u r a b i l i t y t o g i v e t r u t h f u l a n d c o m p l e t e 12 a n s w e r s t o m y q u e s t i o n s h e r e t o d a y ? 13 A . N o . 14 Q . I s t h e r e a n y o t h e r r e a s o n t h a t 15 y o u w o u l d b e u n a b l e t o g i v e c o m p l e t e a n d 16 t r u t h f u l a n s w e r s t o m y q u e s t i o n s t o d a y ? 17 A . I a m r e c o v e r i n g f r o m a v e r y b a d 18 c o l d , s o I a m n o t s u r e o n t h a t a n s w e r . 19 Q . S o y o u t h i n k t h e b a d c o l d m i g h t 20 i n t e r f e r e w i t h y o u r a b i l i t y t o g i v e 21 t r u t h f u l a n d c o m p l e t e a n s w e r s ? 22 A . N o , I m a y h a v e t o b l o w m y n o s e 23 a n d s o f o r t h . S o t h a t i s t h e p o i n t . 24 Q . A s i d e f r o m h a v i n g t o b l o w y o u r 25 n o s e --</p>

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<p style="text-align: right;">Page 6</p> <p>1 WILSON</p> <p>2 A. Clear my throat.</p> <p>3 Q. -- and possibly taking a break,</p> <p>4 does the fact that you are recovering from</p> <p>5 a cold interfere with your ability to give</p> <p>6 truthful and complete answer?</p> <p>7 A. No.</p> <p>8 Q. It is important that you allow</p> <p>9 me to finish my question before you start</p> <p>10 answering. The court reporter can't take</p> <p>11 down both of us at the same time. Okay.</p> <p>12 MR. JAMES KLEIN: Can I just</p> <p>13 interject something? Last night we</p> <p>14 received the Supplemental Disclosure under</p> <p>15 Federal Rule 26 A where you disclosed to</p> <p>16 us for the first time Ms. Joan C. Waters</p> <p>17 as a potential witness in this case.</p> <p>18 MR. MARK KLEIN: Actually I</p> <p>19 e-mailed it to you last week.</p> <p>20 MR. JAMES KLEIN: I don't think</p> <p>21 I received it subsequent to the</p> <p>22 investigation of documents obtained by</p> <p>23 CUNY's investigation. Since I had not</p> <p>24 seen this until last night, you know, I am</p> <p>25 going to have a standing objection with</p>	<p style="text-align: right;">Page 8</p> <p>1 WILSON</p> <p>2 A. I don't understand the question.</p> <p>3 Q. Well, do you have a resume in</p> <p>4 your possession either at home or here?</p> <p>5 A. Not here, but I do have a resume</p> <p>6 at home.</p> <p>7 Q. And you reviewed that in</p> <p>8 preparation for your deposition here</p> <p>9 today?</p> <p>10 A. Yes.</p> <p>11 MR. MARK KLEIN: I call for</p> <p>12 production of Dr. Wilson's resume that he</p> <p>13 reviewed.</p> <p>14 Q. Besides reviewing your resume,</p> <p>15 did you do anything else in preparation</p> <p>16 for your deposition?</p> <p>17 A. I reviewed my books.</p> <p>18 Q. What books are you referring to?</p> <p>19 A. That would include Tearing Down</p> <p>20 the Color Bar, A Documentary History and</p> <p>21 Analysis of the Brotherhood of Sleeping</p> <p>22 Car Porters. That would include Black</p> <p>23 Labor in America. That would include Race</p> <p>24 and Labor Matters the New Political</p> <p>25 Economy. That would include -- because</p>
<p style="text-align: right;">Page 7</p> <p>1 WILSON</p> <p>2 regards to anything that is the subject</p> <p>3 matter of Ms. Waters' potential testimony</p> <p>4 because I do not believe that we had any</p> <p>5 opportunity to do any discovery, and we</p> <p>6 just got this last night.</p> <p>7 MR. MARK KLEIN: Well, your</p> <p>8 objection is completely off base, but I</p> <p>9 hear what you say.</p> <p>10 Q. All right. Dr. Wilson, what,</p> <p>11 if anything, did you do in preparing for</p> <p>12 your deposition here today?</p> <p>13 MR. JAMES KLEIN: I would</p> <p>14 object as to any privileged issues.</p> <p>15 Q. Can you answer the question,</p> <p>16 sir?</p> <p>17 A. I reviewed my history of</p> <p>18 employment at CUNY.</p> <p>19 Q. And how did you go about</p> <p>20 reviewing the history of your employment</p> <p>21 at CUNY?</p> <p>22 A. By carefully reviewing my</p> <p>23 resume.</p> <p>24 Q. And what resume are you</p> <p>25 referring to?</p>	<p style="text-align: right;">Page 9</p> <p>1 WILSON</p> <p>2 the actual encyclopedia was taken from me,</p> <p>3 but the -- my Encyclopedia of Revolution</p> <p>4 and Protest.</p> <p>5 Q. When you said the actual</p> <p>6 encyclopedia was taken from you, what</p> <p>7 encyclopedia are you referring to?</p> <p>8 A. The Encyclopedia of Protest and</p> <p>9 Revolution. It is an eight-volume</p> <p>10 publication.</p> <p>11 Q. So you reviewed the Encyclopedia</p> <p>12 of Protest and Revolution for preparation</p> <p>13 of your testimony; is that right?</p> <p>14 A. I went on Amazon and just looked</p> <p>15 at the Amazon listing.</p> <p>16 Q. Okay. Besides what you've</p> <p>17 described, did you do anything else in</p> <p>18 preparation for your deposition here</p> <p>19 today?</p> <p>20 MR. JAMES KLEIN: I am just</p> <p>21 going to have a standing objection to</p> <p>22 anything that refers to anything involving</p> <p>23 privilege.</p> <p>24 MR. MARK KLEIN: I am entitled</p> <p>25 to know whether he met with counsel.</p>

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<p style="text-align: right;">Page 10</p> <p>1 WILSON</p> <p>2 MR. JAMES KLEIN: He met with</p> <p>3 counsel. I am saying --</p> <p>4 MR. MARK KLEIN: You don't need</p> <p>5 to repeat it. I want to know what he did</p> <p>6 in preparation for his deposition.</p> <p>7 A. I met with counsel.</p> <p>8 Q. Who did you meet with?</p> <p>9 A. I met with John Yong.</p> <p>10 Q. Anybody else?</p> <p>11 A. I met with Chris Yong.</p> <p>12 Q. Anybody else?</p> <p>13 A. I met with James Klein.</p> <p>14 Q. Anybody else?</p> <p>15 A. I met with two other legal</p> <p>16 associates of John Yong whose -- yes, two</p> <p>17 other legal associates of John Yong.</p> <p>18 Q. What are their names?</p> <p>19 A. I am not -- I am not sure of</p> <p>20 their names.</p> <p>21 Q. Anybody else that you met with?</p> <p>22 A. There may have been a paralegal</p> <p>23 who sat in at one of those meetings.</p> <p>24 Q. All right. Did you meet with</p> <p>25 John Yong, Chris Yong, and James Klein all</p>	<p style="text-align: right;">Page 12</p> <p>1 WILSON</p> <p>2 for your deposition here today?</p> <p>3 A. Just a few minutes ago James and</p> <p>4 I had a very brief meeting.</p> <p>5 Q. Before today when was your most</p> <p>6 recent meeting with counsel in preparation</p> <p>7 for your deposition?</p> <p>8 A. Sunday.</p> <p>9 Q. And where did you meet Sunday?</p> <p>10 A. At my apartment.</p> <p>11 Q. Where is your apartment?</p> <p>12 A. 215 West 91st Street, Apartment</p> <p>13 83.</p> <p>14 Q. And that is in Manhattan?</p> <p>15 A. Manhattan, New York City.</p> <p>16 Q. And who did you meet with on</p> <p>17 Sunday at your apartment?</p> <p>18 A. James Klein.</p> <p>19 Q. And how long did you meet with</p> <p>20 Mr. Klein?</p> <p>21 A. A couple of hours.</p> <p>22 Q. Did you meet in the morning or</p> <p>23 in the afternoon or in the evening?</p> <p>24 A. Afternoon.</p> <p>25 Q. And it is your testimony that in</p>
<p style="text-align: right;">Page 11</p> <p>1 WILSON</p> <p>2 together or separately?</p> <p>3 A. I met with them separately and</p> <p>4 in combinations.</p> <p>5 Q. How many meetings did you have</p> <p>6 with counsel in preparation for your</p> <p>7 deposition today?</p> <p>8 A. I would say a few.</p> <p>9 Q. Can you be any more exact?</p> <p>10 A. Can you repeat the question?</p> <p>11 Q. Can you be any more specific as</p> <p>12 to how many times you met with counsel in</p> <p>13 preparation for your deposition here</p> <p>14 today?</p> <p>15 A. Do you mean with each one of</p> <p>16 those people?</p> <p>17 Q. Yes. How many meetings did you</p> <p>18 have?</p> <p>19 A. Approximately ten.</p> <p>20 Q. You had approximately ten</p> <p>21 meetings in preparation for your</p> <p>22 deposition here today; is that right?</p> <p>23 A. That's right.</p> <p>24 Q. When was the most recent meeting</p> <p>25 you had in preparation with your counsel</p>	<p style="text-align: right;">Page 13</p> <p>1 WILSON</p> <p>2 addition to meeting with Mr. Klein on</p> <p>3 Sunday at your apartment you had</p> <p>4 approximately another nine meetings with</p> <p>5 counsel in preparation for your deposition</p> <p>6 today; is that right?</p> <p>7 A. That's correct.</p> <p>8 Q. When was the first time you met</p> <p>9 with any counsel to prepare for your</p> <p>10 deposition?</p> <p>11 A. I don't recall the first day.</p> <p>12 Q. What is your best recollection</p> <p>13 as to when you first met with counsel in</p> <p>14 preparation for your deposition?</p> <p>15 A. Maybe three weeks ago.</p> <p>16 Q. So it was in the calendar year</p> <p>17 2019; is that right?</p> <p>18 A. Well, no, there were some</p> <p>19 meetings in the calendar year of 2018, so</p> <p>20 that perhaps would have been more than</p> <p>21 three weeks ago.</p> <p>22 Q. Well, were these meetings in the</p> <p>23 calendar year 2018 in preparation for your</p> <p>24 deposition?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 14</p> <p>1 WILSON</p> <p>2 Q. All together what is your best</p> <p>3 approximation of how many hours you spent</p> <p>4 with counsel preparing for your deposition</p> <p>5 here today?</p> <p>6 A. Maybe eight to ten hours.</p> <p>7 MR. MARK KLEIN: I ask that the</p> <p>8 reporter mark as Wilson Exhibit 1 a</p> <p>9 document titled "Plaintiff's Initial</p> <p>10 Disclosures."</p> <p>11 (Wilson Exhibit 1 marked for</p> <p>12 identification.)</p> <p>13 (Document handed to witness.)</p> <p>14 Q. Dr. Wilson, I show you what has</p> <p>15 been marked as Wilson Exhibit 1. Please</p> <p>16 take a moment to review the document and</p> <p>17 tell me when you have done so.</p> <p>18 (Document handed to witness.)</p> <p>19 (Pause.)</p> <p>20 Q. You don't have to read the whole</p> <p>21 document now. I will point you to</p> <p>22 specific parts I will ask you questions</p> <p>23 about.</p> <p>24 MR. JAMES KLEIN: You shouldn't</p> <p>25 feel rushed. You should take whatever</p>	<p style="text-align: right;">Page 16</p> <p>1 WILSON</p> <p>2 incidents and so forth and the various</p> <p>3 people.</p> <p>4 Q. So you sat with counsel and</p> <p>5 orally provided information to counsel; is</p> <p>6 that right?</p> <p>7 A. That's correct.</p> <p>8 Q. And counsel then prepared a</p> <p>9 draft of the document; is that right?</p> <p>10 MR. JAMES KLEIN: Well, I think</p> <p>11 that is privileged what counsel did.</p> <p>12 Q. Did you see a draft of the</p> <p>13 document before it was served?</p> <p>14 A. Yes, I did.</p> <p>15 Q. So the document is dated June 29</p> <p>16 of 2018. You saw a draft before it went</p> <p>17 out; is that right?</p> <p>18 A. Yes, I did.</p> <p>19 Q. How far in advance of June 29,</p> <p>20 2018 did you see a draft?</p> <p>21 A. I don't recall.</p> <p>22 Q. To your knowledge, is there</p> <p>23 anything in this document that is not</p> <p>24 accurate?</p> <p>25 A. Not to my knowledge.</p>
<p style="text-align: right;">Page 15</p> <p>1 WILSON</p> <p>2 time you need to review the document.</p> <p>3 Q. Have you reviewed it, Dr.</p> <p>4 Wilson?</p> <p>5 A. Partially.</p> <p>6 Q. Have you seen this document</p> <p>7 before today?</p> <p>8 A. Yes.</p> <p>9 Q. Did you have any role in its</p> <p>10 preparation?</p> <p>11 A. Yes.</p> <p>12 Q. What role did you have?</p> <p>13 A. This information was</p> <p>14 provided -- I provided much of the</p> <p>15 information.</p> <p>16 Q. How did you go about providing</p> <p>17 information? Did you type it and send it</p> <p>18 to counsel?</p> <p>19 A. No.</p> <p>20 MR. JAMES KLEIN: Again, any</p> <p>21 privilege issue I object.</p> <p>22 MR. MARK KLEIN: It is not</p> <p>23 privileged how he provided information.</p> <p>24 A. Through sitting with counsel and</p> <p>25 attempting to remember the various</p>	<p style="text-align: right;">Page 17</p> <p>1 WILSON</p> <p>2 Q. Okay. I would like to direct</p> <p>3 your attention to the bottom of page 2 of</p> <p>4 the document. You identify Natalie</p> <p>5 Miller as an individual likely to have</p> <p>6 knowledge of discoverable facts, correct?</p> <p>7 A. Correct.</p> <p>8 Q. When was the last time you</p> <p>9 communicated with Natalie Miller?</p> <p>10 A. Sometime -- I don't remember the</p> <p>11 exact date.</p> <p>12 Q. What is your best recollection</p> <p>13 of the last time you spoke with her?</p> <p>14 A. Maybe within the last couple of</p> <p>15 weeks.</p> <p>16 Q. For what purpose did you speak</p> <p>17 with her within the last couple of week?</p> <p>18 A. To see how she was doing.</p> <p>19 Q. Was that the only purpose?</p> <p>20 A. That was the only purpose.</p> <p>21 Q. You didn't communicate with her</p> <p>22 regarding preparation for your deposition?</p> <p>23 A. No.</p> <p>24 Q. Now, you identify as the subject</p> <p>25 matter of her knowledge "Search and</p>

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<p style="text-align: right;">Page 18</p> <p>1 WILSON</p> <p>2 seizure, witnessed seizure and destruction</p> <p>3 and removal of plaintiff's property and</p> <p>4 loss of mail delivery."</p> <p>5 Do you see that?</p> <p>6 A. I see that.</p> <p>7 Q. What seizure and destruction and</p> <p>8 removal of plaintiff's property are you</p> <p>9 referring to?</p> <p>10 A. Ms. Miller was present when the</p> <p>11 raid occurred in the -- when the raid</p> <p>12 occurred, the initial raid.</p> <p>13 Q. And what raid are you referring</p> <p>14 to?</p> <p>15 A. That was the raid conducted by</p> <p>16 Ms. Isaacson and her staff at 25 Broadway.</p> <p>17 Q. Is it your testimony that</p> <p>18 Ms. Miller was present when Ms. Isaacson</p> <p>19 and others were there at your office?</p> <p>20 A. That's my testimony.</p> <p>21 Q. And how do you know that</p> <p>22 Ms. Miller was present when Ms. Isaacson</p> <p>23 and others came to your office at 25</p> <p>24 Broadway?</p> <p>25 A. I witnessed it.</p>	<p style="text-align: right;">Page 20</p> <p>1 WILSON</p> <p>2 the others didn't identify themselves, and</p> <p>3 there was one other individual who I</p> <p>4 forget. He may have identified himself.</p> <p>5 Q. How many people besides</p> <p>6 Ms. Isaacson were there?</p> <p>7 A. Maybe approximately eight</p> <p>8 people.</p> <p>9 Q. And don't you know the names of</p> <p>10 any of these approximately eight people</p> <p>11 besides Ms. Isaacson; is that right?</p> <p>12 A. Clarification. When you say</p> <p>13 you were there, what do you mean? With</p> <p>14 Ms. Isaacson.</p> <p>15 Q. With Ms. Isaacson, yes.</p> <p>16 A. Yes. Right. And I don't know</p> <p>17 the names of the others.</p> <p>18 Q. And you entered the premises</p> <p>19 while the "Raid" was in progress you</p> <p>20 testified?</p> <p>21 A. Correct.</p> <p>22 Q. And Ms. Miller was already</p> <p>23 there?</p> <p>24 A. Yes.</p> <p>25 Q. And was anybody else there who</p>
<p style="text-align: right;">Page 19</p> <p>1 WILSON</p> <p>2 Q. You were there as well?</p> <p>3 A. Correct.</p> <p>4 Q. Do you know the date of the</p> <p>5 "Raid" that you are referring to?</p> <p>6 A. That would have been the end of</p> <p>7 January 2012 approximately, the last week.</p> <p>8 Q. And you were in your office when</p> <p>9 Ms. Isaacson and others came to conduct</p> <p>10 the "Raid" to use your word?</p> <p>11 A. No.</p> <p>12 Q. How is it that you witnessed it</p> <p>13 if you weren't in your office?</p> <p>14 A. Because I entered the premises</p> <p>15 while the raid was in progress.</p> <p>16 Q. What time of day was this?</p> <p>17 A. It would have been afternoon,</p> <p>18 late afternoon I believe.</p> <p>19 Q. And you've testified that</p> <p>20 Ms. Isaacson was present at the time of</p> <p>21 this "Raid"?</p> <p>22 A. Correct.</p> <p>23 Q. Who else was present besides</p> <p>24 Ms. Isaacson?</p> <p>25 A. There were other parties, and</p>	<p style="text-align: right;">Page 21</p> <p>1 WILSON</p> <p>2 worked at the Graduate Center For Worker</p> <p>3 Education?</p> <p>4 A. Yes.</p> <p>5 Q. Who?</p> <p>6 A. Annie London, Immanuel Ness.</p> <p>7 There were I believe some students there.</p> <p>8 Q. Were students in your office?</p> <p>9 A. No.</p> <p>10 Q. Was Ms. London in your office?</p> <p>11 A. No.</p> <p>12 Q. Was Professor Ness in your</p> <p>13 office?</p> <p>14 A. No.</p> <p>15 Q. Was Ms. Miller in your office?</p> <p>16 A. No.</p> <p>17 Q. Was there anyone else in your</p> <p>18 office besides you and Ms. Isaacson and</p> <p>19 the others with her?</p> <p>20 A. I didn't say I was in the</p> <p>21 office.</p> <p>22 MR. JAMES KLEIN: That is a</p> <p>23 mischaracterization.</p> <p>24 Q. Were you in your office at the</p> <p>25 time?</p>

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<p style="text-align: right;">Page 22</p> <p>1 WILSON</p> <p>2 A. No.</p> <p>3 Q. What, if anything, did you say</p> <p>4 to Ms. Isaacson when you entered the</p> <p>5 premises?</p> <p>6 A. I believe I said what are you</p> <p>7 doing here.</p> <p>8 Q. And what, if anything, did</p> <p>9 Ms. Isaacson respond?</p> <p>10 A. I don't recall her response.</p> <p>11 Q. Do you recall any discussion</p> <p>12 that you had with any of the -- either</p> <p>13 with Ms. Isaacson or any of the people who</p> <p>14 accompanied her?</p> <p>15 A. Yes.</p> <p>16 Q. What do you recall?</p> <p>17 A. I recall Ms. Isaacson leaving</p> <p>18 with some of my files, and the only file</p> <p>19 that I could see that was obvious was</p> <p>20 lecture notes.</p> <p>21 Q. And what lecture notes?</p> <p>22 A. That would have been lecture</p> <p>23 notes for a class that I would have been</p> <p>24 presenting, and that probably would have</p> <p>25 been, you know, a pending class or an</p>	<p style="text-align: right;">Page 24</p> <p>1 WILSON</p> <p>2 were staff and students from City College.</p> <p>3 They have a large staff, so they were in</p> <p>4 the area in the vicinity while this was</p> <p>5 happening.</p> <p>6 Q. And I just want to be sure</p> <p>7 before I move on. You have no</p> <p>8 recollection of any discussion that you</p> <p>9 had with Ms. Isaacson or anybody that was</p> <p>10 with her?</p> <p>11 A. That is not what I said.</p> <p>12 Q. Do you have any recollection of</p> <p>13 any discussion you had with Ms. Isaacson</p> <p>14 or anyone else who was with her?</p> <p>15 A. Yes, I do.</p> <p>16 Q. What do you recall?</p> <p>17 A. I recall asking Ms. Isaacson why</p> <p>18 is she taking my lectures, and I said I</p> <p>19 need my lectures. I use those for</p> <p>20 teaching.</p> <p>21 Q. Do you recall her response, if</p> <p>22 any?</p> <p>23 A. She didn't tell me why she was</p> <p>24 taking them.</p> <p>25 Q. Do you recall any other</p>
<p style="text-align: right;">Page 23</p> <p>1 WILSON</p> <p>2 upcoming class but in preparation for a</p> <p>3 lecture.</p> <p>4 Q. How far away from --</p> <p>5 MR. MARK KLEIN: Withdrawn.</p> <p>6 Q. You have an office at the</p> <p>7 Graduate Center For Worker Education,</p> <p>8 correct?</p> <p>9 A. Correct.</p> <p>10 Q. On what floor of the building at</p> <p>11 25 Broadway was your office?</p> <p>12 A. Seventh.</p> <p>13 Q. Seventh floor?</p> <p>14 A. But I didn't finish the first</p> <p>15 question you asked me. You asked me who</p> <p>16 else was present, and you didn't let me</p> <p>17 finish my answer.</p> <p>18 Q. Who else was present?</p> <p>19 A. Well, there was the -- there</p> <p>20 are -- I think there were other staff</p> <p>21 members who I don't recall from -- from</p> <p>22 the Center For Worker Education -- from</p> <p>23 the Graduate Center For Worker Education.</p> <p>24 There were representatives from the</p> <p>25 Manhattan institute of management. There</p>	<p style="text-align: right;">Page 25</p> <p>1 WILSON</p> <p>2 discussion you had other than what you've</p> <p>3 testified to with either Ms. Isaacson or</p> <p>4 anybody who was with her?</p> <p>5 A. Well, the -- she was with a</p> <p>6 gentleman who introduced himself, but we</p> <p>7 had no discussion.</p> <p>8 Q. Was it somebody from Brooklyn</p> <p>9 College who introduced himself?</p> <p>10 A. No.</p> <p>11 Q. Do you recall anything else that</p> <p>12 was said between you and any -- and</p> <p>13 Ms. Isaacson and any of the people who</p> <p>14 were with her besides what you have</p> <p>15 testified on this day in late January of</p> <p>16 2012 when you say your office was</p> <p>17 "Raided"?</p> <p>18 A. I do remember one of the members</p> <p>19 of her raiding party instructing everyone</p> <p>20 within ear shouting distance not to move.</p> <p>21 They can't leave. Don't use any</p> <p>22 telephones. You're not allowed to talk.</p> <p>23 Q. And have you finished your</p> <p>24 answer?</p> <p>25 A. I am thinking if there was any</p>

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1 WILSON
2 other exchanges of information. No,
3 other than the fact that they had -- I saw
4 no identification, and I am not sure
5 whether they were carrying guns or not,
6 but that was --
7 Q. Was the person who gave the
8 instructions that you just testified about
9 a man or a woman?
10 A. A man.
11 Q. Was it a uniformed person or
12 not?
13 A. Plain clothes.
14 Q. Again, other than what you have
15 testified to, do you recall anything else
16 that was said either by you or
17 Ms. Isaacson or the people who were with
18 her on this day in late January that you
19 have been testifying about?
20 A. Yes. I recall now that there
21 were two observers present from the
22 professional staff congress.
23 Q. Well, did either of those
24 observers say anything?
25 A. They said something to me.

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1 WILSON
2 Q. What did they say?
3 A. They said we are here to witness
4 and to observe this.
5 Q. Did they give you their names?
6 A. One name I remember, first name
7 Renee. There was also a gentleman whose
8 name I don't recall.
9 Q. Did you say anything in response
10 to they're telling that they were there to
11 witness and observe this?
12 A. Yes. I said what is going on to
13 them.
14 Q. And what, if anything, did they
15 respond?
16 A. They said we don't know.
17 Q. All right. Other than what you
18 have testified to before, did you or
19 Ms. Isaacson or any of the people that she
20 was with say anything else during this
21 event in late January of 2012 at your
22 office at 25 Broadway?
23 A. At the moment, at this moment
24 that is all that I can recollect.
25 Q. Now, you testified before that

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1 WILSON
2 Ms. London, Professor Ness, and Ms. Miller
3 were present on the day of the event
4 you've been describing, correct?
5 A. That's correct.
6 Q. How far away from your office
7 were these people?
8 A. They were in different
9 positions, so they weren't equivalent
10 distances away.
11 Q. Was the door to your office open
12 or closed during the time that
13 Ms. Isaacson and the people with her were
14 in your office?
15 A. I observed it as being both open
16 and both closed.
17 Q. How long after the "raid" that
18 you have referred to --
19 MR. MARK KLEIN: Withdrawn.
20 Q. How long after the "Raid"
21 started did you arrive?
22 A. I don't know precisely when it
23 started so -- so I can't answer that the
24 way you phrased it.
25 Q. Did you ask anybody how long

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1 WILSON
2 Ms. Isaacson and the people with her had
3 been there before you arrived?
4 A. No.
5 Q. Did anyone at any time explain
6 to you the purpose for entering your
7 office on this day in late January 2012?
8 A. No, not that I can recall. You
9 mean on that day?
10 Q. Yes.
11 A. No.
12 Q. How long were Ms. Isaacson and
13 the people with her there during the time
14 that you were also present?
15 A. Approximately an hour.
16 Q. And do you know what time of day
17 Ms. Isaacson and the people with her left
18 on that day in late January 2012?
19 A. What time they left?
20 Q. Yes.
21 A. It would have been late
22 afternoon, early evening about an hour or
23 so later after I arrived.
24 Q. And when they left, did they
25 lock the door to your office?

8 (Pages 26 - 29)

<p style="text-align: right;">Page 30</p> <p>1 WILSON</p> <p>2 A. No.</p> <p>3 Q. Were you able to get into your</p> <p>4 office?</p> <p>5 A. Yes.</p> <p>6 Q. And so you went in to your</p> <p>7 office after they left, and did you</p> <p>8 observe what, if anything, had been taken?</p> <p>9 A. It would have been impossible to</p> <p>10 know what was taken.</p> <p>11 Q. Why was it impossible to know</p> <p>12 what was taken?</p> <p>13 A. When you have an office with</p> <p>14 hundreds of things, how would you know out</p> <p>15 of hundred of things what was taken and</p> <p>16 what wasn't.</p> <p>17 Q. Well, let's talk a minute about</p> <p>18 your office. What were the dimensions of</p> <p>19 your office on the 7th floor of 25</p> <p>20 Broadway back in 2012?</p> <p>21 A. I would say approximately 20 by</p> <p>22 15 approximately.</p> <p>23 Q. Dr. Wilson, I am going to give</p> <p>24 you a blank piece of paper and a pen.</p> <p>25 A. I've got a pen.</p>	<p style="text-align: right;">Page 32</p> <p>1 WILSON</p> <p>2 moved from another office into that one,</p> <p>3 the one you just drew?</p> <p>4 A. Approximately.</p> <p>5 Q. Did the office that you just</p> <p>6 drew for us, did it have an office number</p> <p>7 or letter, any designation?</p> <p>8 A. I believe it was -- maybe it was</p> <p>9 7 or maybe it was 705 or 75.</p> <p>10 Q. Is it 7-5, something like that?</p> <p>11 A. I am -- it is either 75 or 705.</p> <p>12 Something like that approximately.</p> <p>13 Q. All right. So were you inside</p> <p>14 the office while Ms. Isaacson and the</p> <p>15 people who were with her were in your</p> <p>16 office?</p> <p>17 A. No.</p> <p>18 Q. So you testified that the door</p> <p>19 was unlocked after Ms. Isaacson and people</p> <p>20 with her left, correct?</p> <p>21 A. Correct.</p> <p>22 Q. You then you went into your</p> <p>23 office?</p> <p>24 A. Yes, I did.</p> <p>25 Q. Did you make any effort to</p>
<p style="text-align: right;">Page 31</p> <p>1 WILSON</p> <p>2 Q. What I would like you to do is</p> <p>3 draw the outlines of your office at -- on</p> <p>4 the seventh floor at 25 Broadway back in</p> <p>5 2012. If you would make it a good size,</p> <p>6 so we can identify the things in it to the</p> <p>7 best of your ability.</p> <p>8 A. (Witness complies.)</p> <p>9 Q. Thank you.</p> <p>10 Can you direct us to north or</p> <p>11 south or east or west?</p> <p>12 A. North or south. Let's see. I</p> <p>13 think this --</p> <p>14 MR. JAMES KLEIN: You don't</p> <p>15 have to guess.</p> <p>16 A. This probably would have been</p> <p>17 north.</p> <p>18 Q. Okay. And the window, did that</p> <p>19 look out on Broadway?</p> <p>20 A. I'm not sure. I don't think</p> <p>21 so.</p> <p>22 Q. How long had you occupied that</p> <p>23 office as of 2012?</p> <p>24 A. About three years.</p> <p>25 Q. So three years before you had</p>	<p style="text-align: right;">Page 33</p> <p>1 WILSON</p> <p>2 determine what materials were missing, if</p> <p>3 any?</p> <p>4 A. At that moment, I was rather</p> <p>5 stunned and met with my staff like what is</p> <p>6 going on. What was going on? And that</p> <p>7 was my initial -- so, no, I wasn't</p> <p>8 starting to look at what is missing. No.</p> <p>9 Q. What, if anything, did you see</p> <p>10 Ms. Isaacson and the people with her carry</p> <p>11 out with them when they left besides the</p> <p>12 folder which you thought were your lecture</p> <p>13 notes?</p> <p>14 A. Well, Ms. Isaacson had a stack</p> <p>15 of papers or files. Other than the</p> <p>16 lecture notes that is all I know, and I</p> <p>17 think others carried things out, but I</p> <p>18 really wasn't focusing on that.</p> <p>19 Q. So you said Ms. Isaacson had a</p> <p>20 stack she carried in her own arms?</p> <p>21 A. Correct.</p> <p>22 Q. Some files; is that right?</p> <p>23 A. She had some files in her arms.</p> <p>24 Q. Were these loose papers or were</p> <p>25 these in folders or manilla folders of any</p>

<p style="text-align: right;">Page 34</p> <p>1 WILSON</p> <p>2 kind?</p> <p>3 A. They were in files.</p> <p>4 Q. When you say they were in files,</p> <p>5 what kind of files?</p> <p>6 A. These would have been manilla</p> <p>7 and brown files.</p> <p>8 Q. And approximately how many</p> <p>9 manilla and brown files did Ms. Isaacson</p> <p>10 have in her arms when she left your office</p> <p>11 on this day in late January 2012?</p> <p>12 A. Well, because I don't know the</p> <p>13 thickness of each file, I couldn't give</p> <p>14 you an exact answer.</p> <p>15 Q. Well, what is your best</p> <p>16 approximation as to how many files?</p> <p>17 A. Several.</p> <p>18 Q. Several being more than five?</p> <p>19 A. As I said, I can't tell you</p> <p>20 exactly, so I don't know if it was five,</p> <p>21 three, eight. I can't tell you.</p> <p>22 Q. You have no approximation</p> <p>23 whatsoever as to how many files</p> <p>24 Ms. Isaacson had in her arms?</p> <p>25 A. Well, let's say between 3 and</p>	<p style="text-align: right;">Page 36</p> <p>1 WILSON</p> <p>2 A. I've taught many classes.</p> <p>3 Q. How many classes were you</p> <p>4 teaching in January of 2012?</p> <p>5 A. Probably two at the Center For</p> <p>6 Worker Education.</p> <p>7 Q. And what were those two classes?</p> <p>8 A. I'm not sure.</p> <p>9 Q. Now, you testified that after</p> <p>10 Ms. Isaacson and the people who were with</p> <p>11 her left your office you were stunned and</p> <p>12 you talked with your staff but did not at</p> <p>13 that time try to determine what papers had</p> <p>14 been taken; is that correct?</p> <p>15 A. That's right.</p> <p>16 Q. At any time thereafter did you</p> <p>17 make any effort to determine what papers,</p> <p>18 if any, had been taken?</p> <p>19 A. Well, yes. I asked -- I asked</p> <p>20 Ms. Miller and Ms. London what had been</p> <p>21 taken, and they said that computer hard</p> <p>22 drives had been taken including one of my</p> <p>23 computer hard drives.</p> <p>24 Q. All right. Besides the</p> <p>25 computer hard drives, did you at any time</p>
<p style="text-align: right;">Page 35</p> <p>1 WILSON</p> <p>2 10.</p> <p>3 Q. You testified before that</p> <p>4 Ms. Isaacson had among the papers she took</p> <p>5 with her your lecture notes; is that</p> <p>6 right?</p> <p>7 A. That's the file that I saw.</p> <p>8 Q. Did Ms. Isaacson show the</p> <p>9 lecture notes to you?</p> <p>10 A. No.</p> <p>11 Q. How did you know they were</p> <p>12 lecture notes?</p> <p>13 A. Because it was on top of the</p> <p>14 stack that she was carrying and it had the</p> <p>15 class or the lecture that I was going to</p> <p>16 give.</p> <p>17 Q. And what class was listed?</p> <p>18 A. I don't recall the specific</p> <p>19 class.</p> <p>20 Q. What were you teaching at that</p> <p>21 time, what courses?</p> <p>22 A. Let's see. I would have to</p> <p>23 double-check the record. Public</p> <p>24 administration probably but --</p> <p>25 Q. You're not sure?</p>	<p style="text-align: right;">Page 37</p> <p>1 WILSON</p> <p>2 make any effort to determine what files</p> <p>3 had been taken?</p> <p>4 A. Well, I -- you know,</p> <p>5 subsequently speaking with staff asking</p> <p>6 what were they looking for, and we didn't</p> <p>7 know, so I guess that would be the answer.</p> <p>8 Like what are they looking for, so --</p> <p>9 Q. That's not what I asked you, Dr.</p> <p>10 Wilson. I asked you at any time after</p> <p>11 Ms. Isaacson and the people with her left</p> <p>12 your office on this day in late January</p> <p>13 2012 did you make any effort to determine</p> <p>14 what files, if any, were missing from your</p> <p>15 office?</p> <p>16 A. No.</p> <p>17 Q. And why didn't you do that?</p> <p>18 A. Well, I think just because of</p> <p>19 the trauma of the situation, and I was</p> <p>20 most immediately focused on being able to</p> <p>21 conduct my teaching. So my main concern</p> <p>22 was getting back my teaching file. That</p> <p>23 was my preeminent concern. How would I</p> <p>24 teach without my files.</p> <p>25 Q. Did you ever ask for the return</p>

10 (Pages 34 - 37)

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1 WILSON
2 of your teaching file?
3 A. Yes, I did.
4 Q. When?
5 A. I actually said to Ms. Isaacson
6 I want my file back.
7 Q. And when did you say that to
8 Ms. Isaacson?
9 A. When she was on her way out.
10 Q. Okay.
11 A. As I recall.
12 Q. At any time after the day on
13 which you allege Ms. Isaacson took your
14 teaching file, did you make a request for
15 its return?
16 A. I -- yes, I did.
17 Q. And did you make that request in
18 writing or orally?
19 A. That would have been -- well, at
20 some point I asked in writing for my files
21 back.
22 Q. And when did you ask in writing
23 for your files back?
24 A. That would have been in February
25 of 2012, that month, you know, in the next

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1 WILSON
2 couple of weeks.
3 Q. So it is your testimony that
4 sometime in the next couple of weeks you
5 asked for the return of your teaching
6 files; is that right, in writing?
7 A. Well, yes. That's correct.
8 Q. And did you make this request by
9 e-mail or in some other way?
10 A. By e-mail.
11 Q. And to whom did you send this
12 request?
13 A. Pam Pollack.
14 Q. Now, did you ever ask for a copy
15 of any of the files that had been removed
16 from your office?
17 A. Yes.
18 Q. When?
19 A. That would have been probably in
20 February of 2012.
21 Q. And to whom did you make that
22 request?
23 A. That also would have been to
24 Brooklyn College counsel Pam Pollack.
25 Q. And you made a request for a

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1 WILSON
2 copy of your files in writing by e-mail to
3 Pam Pollack; is that right?
4 A. That is my recollection.
5 Q. Now, you testified that you saw
6 Ms. Isaacson leave your office
7 with between three and ten files in her
8 arms, correct?
9 A. Correct.
10 Q. Did you see what any of the
11 people with her had in their arms, hands,
12 when they left your office that day in
13 late January 2012?
14 A. I was mainly focused on
15 Ms. Isaacson.
16 Q. So the answer to the
17 question -- to my question is no, you
18 didn't see whether anybody else had
19 anything else in their hands or arms when
20 they left your office?
21 A. I'm not sure. I'm not sure.
22 I think her colleague had some files as
23 well.
24 Q. And when you say her colleague,
25 who are you referring to?

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1 WILSON
2 A. She was with another gentleman
3 whose name I don't recall.
4 Q. And can you describe this
5 gentleman?
6 A. African American. I think he
7 was middle aged, maybe younger than middle
8 aged, and medium height as I recall.
9 Q. Have you told me everything you
10 recall about this gentleman who you
11 thought may have had some files in his
12 arms?
13 A. Repeat the question.
14 Q. You've described this gentleman
15 as African American, maybe younger than
16 middle aged, and medium height. Can you
17 describe him in any further way?
18 A. Yes.
19 Q. How?
20 A. He had on a suit and a tie.
21 Q. And he didn't identify himself
22 to you?
23 A. He may have or Ms. Isaacson may
24 have introduced him by name, but he didn't
25 have on any identifying badge or anything.

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1 WILSON
2 Q. And how many files, if any, did
3 this gentleman that you've described have
4 in his hands or arms when he left?
5 A. I don't remember precisely. I
6 don't remember.
7 Q. All right. Now, we started
8 this whole line of questioning because I
9 asked you about the entry at the bottom of
10 page 2 of Wilson Exhibit 1 with regard to
11 Natalie Miller. By the way Natalie
12 Miller, is that person also known as Pam
13 Miller?
14 A. Correct.
15 Q. So other than the raid that --
16 "Raiding" that you've described, did
17 Ms. Miller witness any other "Seizure and
18 destruction and removal of plaintiff's
19 property and loss of mail" other than what
20 you've already testified to?
21 A. Well, yes.
22 Q. What?
23 A. Subsequent to the raid -- do you
24 mean during the raid?
25 Q. At any other time.

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1 WILSON
2 A. Yes. Subsequent to the raid, I
3 believe on the last week of January the
4 locks to my door were changed, and -- and
5 Ms. Miller said on the following
6 week -- oh, and I was -- I was banned, so
7 I had no -- no longer had access to my
8 office or to the 7th floor at 25 Broadway.
9 I was told in a meeting that I could no
10 longer go there.
11 Q. All right. You said a few
12 things there. You said that "Raid" took
13 place the last week of January 2012,
14 correct?
15 A. Correct.
16 Q. How long thereafter were the
17 locks to your office changed to your
18 knowledge?
19 A. A few days.
20 Q. And there was still some time in
21 January of 2012?
22 A. I believe the last Friday of
23 January. That's my recollection.
24 Q. All right. I want to ask you
25 some more about that, but before we move

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1 WILSON
2 on after this "Raid" that left you stunned
3 to use your word did you attempt to reach
4 out to any member of the Brooklyn College
5 administration to find out what this was
6 all about?
7 A. Well --
8 Q. You can answer that yes or no.
9 A. Yes.
10 Q. And if so to whom did you
11 attempt to reach out to?
12 A. I attempted to reach out to Pam
13 Pollack. I reached out to Barbara
14 Hogstatter.
15 A. I reached out to Dean Phillips.
16 I reached out to Juan Carlos, who was the
17 dean at City College.
18 Q. Anybody else?
19 A. Well, of Brooklyn College
20 administration?
21 Q. Yes.
22 A. I think those would have been
23 all that I could recall at the moment.
24 Q. So you contacted Pam Pollack,
25 Barbara Haugstatter, Dean Phillips, Juan

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1 WILSON
2 Carlos to find out what was going on; is
3 that right?
4 A. Correct.
5 Q. Did you contact each of these
6 people orally?
7 A. By phone.
8 Q. Did you contact any of them by
9 e-mail?
10 A. Pam Pollack.
11 Q. Well, you've testified that you
12 contacted Ms. Pollack a couple of weeks
13 later about trying to get your lecture
14 notes back, right?
15 A. Right.
16 Q. Separate from that, did you have
17 e-mail communications with Ms. Pollack?
18 A. In terms of e-mail, that was the
19 nature of my e-mail to Pam.
20 Q. What, if anything, did
21 Ms. Pollack tell you when you contacted
22 her to find out what was going on?
23 A. My recollection is that
24 Ms. Pollack said I can't give you any
25 information, and this is CUNY, the City

<p>Page 46</p> <p>1 WILSON</p> <p>2 University of New York that is doing this,</p> <p>3 and -- and that's -- so she was very</p> <p>4 enigmatic, quite mysterious.</p> <p>5 Q. Did Ms. Pollack at any time</p> <p>6 inform you what was going on?</p> <p>7 A. No.</p> <p>8 Q. You said you reached out to</p> <p>9 Barbara Haugstatter?</p> <p>10 A. Yes.</p> <p>11 Q. And she is the secretary to the</p> <p>12 chairman of the political science</p> <p>13 department; is that right?</p> <p>14 A. At that time, correct.</p> <p>15 Q. And is there a reason you</p> <p>16 reached out to the secretary to the</p> <p>17 chairman of the political science</p> <p>18 department to find out what was going on?</p> <p>19 A. Yes.</p> <p>20 Q. What is the reason?</p> <p>21 A. Well, the reason was again,</p> <p>22 first, I had no idea what was going on,</p> <p>23 and so one of my initial concerns was that</p> <p>24 I had two large potted plans that -- they</p> <p>25 are personal plants in the office, and I</p>	<p>Page 48</p> <p>1 WILSON</p> <p>2 Education, did she?</p> <p>3 A. Yes, she did.</p> <p>4 Q. What did she do?</p> <p>5 A. Well at some points she actually</p> <p>6 held office, maintained an office or went</p> <p>7 to 25 Broadway, and then she also</p> <p>8 interacted with our administration of the</p> <p>9 program on a regular basis almost daily.</p> <p>10 Q. What did you say to</p> <p>11 Ms. Haugstatter and what did she say to</p> <p>12 you regarding the pot the /-D plants and</p> <p>13 large easel?</p> <p>14 A. Well, at that point I</p> <p>15 extended -- my /-P first call was like</p> <p>16 where are my plants? You know I don't want</p> <p>17 my plants to die and I got to get my easel</p> <p>18 back. And I said you know, let me come</p> <p>19 by and pick them up. And initially she</p> <p>20 said okay I will see what I can do. And</p> <p>21 then I called her subsequent to that, a</p> <p>22 few days later, and I said well I am also</p> <p>23 concerned about my files. I need -- I</p> <p>24 have to conduct teaching, I know, my</p> <p>25 research. I need my things.</p>
<p>Page 47</p> <p>1 WILSON</p> <p>2 wanted those to make sure that they didn't</p> <p>3 die from lack of water if it was going to</p> <p>4 go on for more than a week or two. I had</p> <p>5 no idea, and that was my initial concern.</p> <p>6 Like my plants are going to die if I can't</p> <p>7 take care of them.</p> <p>8 Q. So you're talking about two</p> <p>9 potted plants in your office at 25</p> <p>10 Broadway?</p> <p>11 A. And an easel that was an oak</p> <p>12 easel there that was actually my wife's</p> <p>13 oak easel, a display easel, and the easel</p> <p>14 was used to put a schedule of daily events</p> <p>15 and classes and so forth, but it was an</p> <p>16 art easel solid observing, and so my first</p> <p>17 concern the first few days was take care</p> <p>18 of my plants and I I want my easel back</p> <p>19 for my wife, and that was my initial --</p> <p>20 Q. Now, Ms. Shag /STET enter is on</p> <p>21 the Brooklyn campus at Brooklyn College,</p> <p>22 correct?</p> <p>23 A. At that point, yes. Correct.</p> <p>24 Q. She didn't have anything to do</p> <p>25 with the Graduate Center For Worker</p>	<p>Page 49</p> <p>1 WILSON</p> <p>2 Q. What did she say?</p> <p>3 A. I'll speak to Paisley.</p> <p>4 Q. The Paisley you are referring to</p> <p>5 is Paisley Currah was he chairman of the</p> <p>6 department at that time of political eye</p> <p>7 science?</p> <p>8 A. Yes, he was the newly elected</p> <p>9 chair who actually ran against me for the</p> <p>10 chairmanship in 2011 May.</p> <p>11 Q. Did you ever have any full up</p> <p>12 conversations with Barbara lag /STET enter</p> <p>13 regard being your plants and your easel</p> <p>14 and your files?</p> <p>15 A. Yes.</p> <p>16 Q. When?</p> <p>17 A. In the following weeks I called</p> <p>18 Barbara again that I have had no</p> <p>19 satisfaction on recovering my property,</p> <p>20 that now this is you know -- this is</p> <p>21 getting -- this is getting crazy, and also</p> <p>22 I am no longer receiving my mail 6789.</p> <p>23 Q. And what, if anything, did</p> <p>24 Ms. Haugstatter respond in your</p> <p>25 conversations with her in the following</p>

13 (Pages 46 - 49)

<p style="text-align: right;">Page 50</p> <p>1 WILSON</p> <p>2 weeks regarding those subjects?</p> <p>3 A. She said I am sorry Joe. I'll</p> <p>4 speak with Paisley. She didn't say</p> <p>5 doctor consider a. She said I'll speak</p> <p>6 with Paisley.</p> <p>7 Q. Now, you testified you also</p> <p>8 spoke with Dean Phillips?</p> <p>9 A. Yes.</p> <p>10 Q. Now, what was Dean Phillips dean</p> <p>11 of?</p> <p>12 A. You mean her exact title?</p> <p>13 Q. Yes.</p> <p>14 A. I think she was the dean of arts</p> <p>15 and sciences, but I am not sure if she was</p> <p>16 ungraduate dean. She may have just been</p> <p>17 undergraduate. I am not sure of her full</p> <p>18 title. She is either graduate or</p> <p>19 undergraduate dean in the arts and</p> <p>20 sciences department, as I recall.</p> <p>21 Q. Why did you contact her to find</p> <p>22 out what was going on?</p> <p>23 A. Well, she -- administratively</p> <p>24 she may have had some understanding of</p> <p>25 what was going on, and then, you know, she</p>	<p style="text-align: right;">Page 52</p> <p>1 WILSON</p> <p>2 A. And I said -- I asked her what</p> <p>3 are they investigating.</p> <p>4 Q. And what did she say?</p> <p>5 A. She said I can't discuss that.</p> <p>6 Q. Did you have any other</p> <p>7 conversations with Dean Phillips regarding</p> <p>8 what was going on besides what you've</p> <p>9 testified to?</p> <p>10 A. At the moment that is all I can</p> <p>11 recall.</p> <p>12 Q. Now, you testified you also</p> <p>13 spoke with Juan Carlos who is the dean at</p> <p>14 City College, right?</p> <p>15 A. Yes.</p> <p>16 Q. And why did you contact him?</p> <p>17 A. Well, administratively it was</p> <p>18 important because we occupied joint space,</p> <p>19 so he was naturally concerned as I was</p> <p>20 concerned with this raid because he was</p> <p>21 aware of the raid. He also wondered what</p> <p>22 they were looking for, and so that was the</p> <p>23 nature of our conversation.</p> <p>24 Q. Did you attempt to speak to</p> <p>25 anyone at CUNY regarding what was going</p>
<p style="text-align: right;">Page 51</p> <p>1 WILSON</p> <p>2 had meetings with the president and so</p> <p>3 forth. So I asked her what was going on.</p> <p>4 Q. And how soon after the "Raid"</p> <p>5 did you contact Dean Phillips?</p> <p>6 A. I would say within the next</p> <p>7 couple of weeks.</p> <p>8 Q. You can't be any more specific?</p> <p>9 A. No.</p> <p>10 Q. And you contacted Dean Phillips</p> <p>11 by telephone?</p> <p>12 A. By telephone.</p> <p>13 Q. And as best you can recall what</p> <p>14 did you say to her and what did she say to</p> <p>15 you in this telephone conversation?</p> <p>16 A. I asked her what is going on,</p> <p>17 you know, what was up with this raid, what</p> <p>18 are they looking for? How come I can't</p> <p>19 have access to my office, to my research,</p> <p>20 to my files, to my documents, to my</p> <p>21 hundreds of books, and my recollection is</p> <p>22 she said that CUNY is conducting an</p> <p>23 investigation.</p> <p>24 Q. Do you remember anything else</p> <p>25 she said to you?</p>	<p style="text-align: right;">Page 53</p> <p>1 WILSON</p> <p>2 on?</p> <p>3 A. When you say at CUNY, what do</p> <p>4 you mean?</p> <p>5 Q. Separate from Brooklyn College,</p> <p>6 did you attempt to speak to any CUNY</p> <p>7 representatives?</p> <p>8 A. Well, the union, the</p> <p>9 professional staff congress, if that's</p> <p>10 what you mean.</p> <p>11 Q. That's not what I meant, but</p> <p>12 that's fine. So you spoke -- you</p> <p>13 contacted someone at the union?</p> <p>14 A. Yes, I was in touch with the</p> <p>15 union.</p> <p>16 Q. When?</p> <p>17 A. Well, immediately the night of</p> <p>18 the raid because the union sent two</p> <p>19 representatives.</p> <p>20 Q. Thereafter did you speak with</p> <p>21 anyone at the union?</p> <p>22 A. And -- yes, I spoke on the</p> <p>23 following Monday with Pete Zwiebach. He</p> <p>24 is union counsel for the Professional</p> <p>25 Staff Congress.</p>

14 (Pages 50 - 53)

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1 WILSON
2 Q. And were you able to obtain any
3 information as to what was going on?
4 A. Pete told me that --
5 MR. JAMES KLEIN: Hold on. I
6 think his communications with Pete, who
7 was his counsel, I think those are
8 privileged.
9 MR. MARK KLEIN: Well, I don't
10 know if there was any communication or
11 advice. If he asked him what is going
12 on, that is not asking for --
13 MR. JAMES KLEIN: He was
14 counsel for the union, and he was
15 represented by the union. What is going
16 on is -- I mean there was an
17 investigation, an internal investigation,
18 which is a formal legal proceeding, and
19 the counsel for the union was representing
20 Joe, and they were having discussions, and
21 I believe that is privileged.
22 MR. MARK KLEIN: Are you
23 directing him not to answer?
24 MR. JAMES KLEIN: Yes.
25 Q. Mr. Zwiebach subsequently

Page 55

1 WILSON
2 represented you in connection with the
3 termination proceedings that Brooklyn
4 College and CUNY brought, correct?
5 A. Correct.
6 Q. Did you ever speak to anybody at
7 the union besides Mr. Zwiebach, regarding
8 what was going on?
9 A. Yes.
10 Q. Who?
11 A. Renee.
12 Q. And Renee was one of the people
13 who was present on the -- at the "Raid" to
14 use your word that you've described?
15 A. Correct.
16 Q. And what did Renee tell you
17 about what was going on, if anything?
18 A. I met with Renee just to figure
19 out what was going on, so she didn't know.
20 Q. She didn't tell you anything?
21 A. No.
22 Q. Did you ask Renee or anyone else
23 at PSC what had led to their sending two
24 representatives to be present when the
25 "Raid" took place?

Page 56

1 WILSON
2 A. Well, I know why they were
3 present.
4 Q. Could you answer my question?
5 A. Yes.
6 Q. Did you discuss with anyone at
7 PSC what led them to send two
8 representatives to be present on --
9 A. Yes.
10 Q. And what did they say to you and
11 what did you say to them?
12 A. I contacted the union upon
13 entering 25 Broadway to send over
14 representatives, and they were right down
15 the street, and so they came over quickly.
16 Q. So it is your testimony that
17 there were no PSC representatives before
18 you arrived?
19 A. That's correct. That is my
20 recollection.
21 Q. And did Renee ever provide you
22 any information as to what was going on?
23 A. No.
24 Q. Going back to your entry for Pam
25 Miller at the bottom of page 2 of Exhibit

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1 WILSON
2 1, have you told me everything that
3 Ms. Miller has knowledge of regarding the
4 "Seizure and destruction and removal of
5 plaintiff's property and loss of mail
6 delivery"?
7 MR. JAMES KLEIN: I think that
8 is a much too confusing compound question.
9 A. Rephrase it.
10 MR. MARK KLEIN: He has
11 described for me some facts of which he
12 believes Ms. Miller is aware of regarding
13 that matter. I am asking if there is
14 anything he hasn't told me. That is a
15 very straightforward question.
16 A. Well, Ms. Miller and I --
17 MR. JAMES KLEIN: No, I don't
18 think that is a straightforward question.
19 Q. Answer the question, sir.
20 A. Ms. Miller and I discussed the
21 raid, and we were trying to figure out
22 what the raid was about.
23 Q. Did Ms. Miller witness any other
24 "Seizure and destruction and removal of
25 plaintiff's property and loss of mail

15 (Pages 54 - 57)

<p style="text-align: right;">Page 58</p> <p>1 WILSON</p> <p>2 delivery" other than what you have</p> <p>3 testified to?</p> <p>4 MR. JAMES KLEIN: That calls</p> <p>5 for speculation. He doesn't know</p> <p>6 everything that she may have witnessed.</p> <p>7 MR. MARK KLEIN: I am asking</p> <p>8 for his knowledge. He can't testify</p> <p>9 about what he doesn't know, but he can</p> <p>10 testify about what he does know.</p> <p>11 MR. JAMES KLEIN: You asked him</p> <p>12 what does she know.</p> <p>13 Q. To the best of your knowledge,</p> <p>14 sir, other than what you have testified</p> <p>15 are you aware of any other facts of which</p> <p>16 Ms. Miller is aware --</p> <p>17 MR. JAMES KLEIN: I believe</p> <p>18 that is an improper question.</p> <p>19 MR. MARK KLEIN: You are</p> <p>20 interrupting my question. That is</p> <p>21 inappropriate. You're obstructing the</p> <p>22 deposition. Cut it out. Now, I am</p> <p>23 going to ask the question again, and I</p> <p>24 don't want to be interrupted, and there is</p> <p>25 nothing wrong with the question to begin</p>	<p style="text-align: right;">Page 60</p> <p>1 WILSON</p> <p>2 Ms. Miller regarding the subject of</p> <p>3 "Seizure and destruction and removal of</p> <p>4 plaintiff's property and loss of mail</p> <p>5 delivery" referred to at the bottom of</p> <p>6 page 2 of Exhibit 1?</p> <p>7 A. Repeat the question.</p> <p>8 Q. Other than your mail, did you</p> <p>9 have any other discussions with</p> <p>10 Ms. Miller -- please don't write on the</p> <p>11 document. That is an exhibit.</p> <p>12 A. Do you have one that is not an</p> <p>13 exhibit that I can write on?</p> <p>14 Q. No.</p> <p>15 A. Then I will --</p> <p>16 Q. You can write on your counsel's</p> <p>17 copy.</p> <p>18 A. I'll write the question. What</p> <p>19 is the question?</p> <p>20 Q. Is this too complicated for you,</p> <p>21 Doctor?</p> <p>22 A. I just want to be precise.</p> <p>23 MR. JAMES KLEIN: There is no</p> <p>24 reason to harass him.</p> <p>25 Q. You have testified about</p>
<p style="text-align: right;">Page 59</p> <p>1 WILSON</p> <p>2 with.</p> <p>3 Q. Dr. Wilson, other than what</p> <p>4 you've testified to you, are you aware of</p> <p>5 any other facts of which Ms. Miller is</p> <p>6 aware regarding the subject of "Seizure</p> <p>7 and destruction and removal of plaintiff's</p> <p>8 property and loss of mail delivery"</p> <p>9 referred to at the bottom of page 2 of</p> <p>10 your initial disclosure?</p> <p>11 MR. JAMES KLEIN: I am going to</p> <p>12 object to that question because it calls</p> <p>13 for speculation. He is not aware of what</p> <p>14 she knows.</p> <p>15 MR. MARK KLEIN: You've made</p> <p>16 your record.</p> <p>17 Q. You can answer the question, Dr.</p> <p>18 Wilson.</p> <p>19 A. Well, I asked Ms. Miller</p> <p>20 specifically about my mail.</p> <p>21 Q. And what did she tell you?</p> <p>22 A. And she said I was no longer</p> <p>23 receiving mail.</p> <p>24 Q. Other than your mail, did you</p> <p>25 have any other conversations with</p>	<p style="text-align: right;">Page 61</p> <p>1 WILSON</p> <p>2 conversations you had with Pam Miller. I</p> <p>3 just want to know if there is anything you</p> <p>4 haven't told me about that subject matter</p> <p>5 that is listed here.</p> <p>6 A. Yes. We talked about Cory</p> <p>7 Robin and Paisley Currah, and their</p> <p>8 ongoing malice towards the program.</p> <p>9 Q. Does what you just responded to</p> <p>10 my question have anything to do with</p> <p>11 "Seizure and destruction and loss of</p> <p>12 plaintiff's mail delivery"? Yes or no.</p> <p>13 A. Yes.</p> <p>14 Q. How does that have to do with</p> <p>15 that?</p> <p>16 A. We speculated that Robin and</p> <p>17 Currah were involved.</p> <p>18 Q. Okay. Have you told me</p> <p>19 everything that you have discussed with</p> <p>20 Ms. Miller regarding the subject matter</p> <p>21 set forth at the bottom?</p> <p>22 A. That is all that I can recall.</p> <p>23 Q. Okay. So that wasn't so hard,</p> <p>24 was it?</p> <p>25 At the top of page 3, you</p>

16 (Pages 58 - 61)

<p style="text-align: right;">Page 62</p> <p>1 WILSON</p> <p>2 identify Josh Board, and with regard to</p> <p>3 him you state in your initial disclosures</p> <p>4 "Witnessed seizure and destruction of</p> <p>5 plaintiff's property at 25 Broadway."</p> <p>6 Do you see that?</p> <p>7 A. No.</p> <p>8 Q. You don't see that at the top of</p> <p>9 page 3?</p> <p>10 A. Yes, I see it.</p> <p>11 Q. Okay. Now, who is Mr. Board?</p> <p>12 A. Josh Board is a graduate student</p> <p>13 at the Graduate Center For Worker</p> <p>14 Education, and he was a part-time employee</p> <p>15 in the capacity of a receptionist and an</p> <p>16 assistant, as I recall.</p> <p>17 Q. Okay. Was he present on the day</p> <p>18 of the "Raid" in late January 2012?</p> <p>19 A. He may have been.</p> <p>20 Q. To the best of your knowledge,</p> <p>21 what information does he have regarding</p> <p>22 "Seizure and destruction of plaintiff's</p> <p>23 property"?</p> <p>24 MR. JAMES KLEIN: Again, that</p> <p>25 calls for speculation.</p>	<p style="text-align: right;">Page 64</p> <p>1 WILSON</p> <p>2 from the administrative offices.</p> <p>3 Q. This is in February of 2012?</p> <p>4 A. February of 2012.</p> <p>5 Q. Did you ask him what items were</p> <p>6 being removed and thrown out?</p> <p>7 A. I didn't ask him specifically.</p> <p>8 Q. Did he tell you what items were</p> <p>9 being removed and thrown out?</p> <p>10 A. He just said they were throwing</p> <p>11 out stuff.</p> <p>12 Q. You didn't ask him what they</p> <p>13 were throwing out?</p> <p>14 A. He didn't know.</p> <p>15 Q. How did you know he didn't know</p> <p>16 if you didn't ask him?</p> <p>17 A. Well, he didn't describe it to</p> <p>18 me. He said they were throwing out</p> <p>19 stuff, and I took that -- and he said they</p> <p>20 are throwing out a lot of stuff, papers</p> <p>21 and -- he was not specific.</p> <p>22 Q. Did he say people were throwing</p> <p>23 out stuff from your office?</p> <p>24 A. Yes, from my office, from the</p> <p>25 administrative offices.</p>
<p style="text-align: right;">Page 63</p> <p>1 WILSON</p> <p>2 MR. MARK KLEIN: It is not</p> <p>3 speculation. Your client -- please let me</p> <p>4 finish. Your client has identified Mr.</p> <p>5 Board as someone who has "Knowledge of</p> <p>6 discoverable facts" and has identified him</p> <p>7 as "Having witnessed the seizure and</p> <p>8 destruction of plaintiff's property at 25</p> <p>9 Broadway." So I am trying to find out</p> <p>10 why he wrote that down there or why you</p> <p>11 wrote that down there on page 3.</p> <p>12 MR. JAMES KLEIN: I'll object.</p> <p>13 I did not write it down. I mean that is a</p> <p>14 completely improper statement to make.</p> <p>15 MR. MARK KLEIN: That is very</p> <p>16 helpful, Mr. Klein. Thank you.</p> <p>17 Q. What seizure and destruction of</p> <p>18 plaintiff's property at 25 Broadway did</p> <p>19 Mr. Board witness?</p> <p>20 A. So at that time --</p> <p>21 Q. What time?</p> <p>22 A. This would have been in February</p> <p>23 of 2012. Josh was working at 25 Broadway,</p> <p>24 and he mentioned to me -- he told me that</p> <p>25 items were being removed and thrown out</p>	<p style="text-align: right;">Page 65</p> <p>1 WILSON</p> <p>2 Q. From the administrative offices,</p> <p>3 not from --</p> <p>4 A. Three -- well my -- my property</p> <p>5 was not only in my office. My property</p> <p>6 was in different locations.</p> <p>7 Q. So your property was in</p> <p>8 different locations at --</p> <p>9 A. That's correct.</p> <p>10 Q. -- 25 Broadway on the 7th floor;</p> <p>11 is that correct?</p> <p>12 A. That's correct.</p> <p>13 Q. Let's go back to the drawing of</p> <p>14 your office.</p> <p>15 MR. MARK KLEIN: If I could have</p> <p>16 that please and ask the reporter to mark</p> <p>17 this drawing AS Wilson Exhibit 2.</p> <p>18 (Wilson Exhibit 2 marked for</p> <p>19 identification.)</p> <p>20 Q. By the way, Dr. Wilson, you just</p> <p>21 said that Mr. Board told you "they" were</p> <p>22 throwing a lot of stuff out, right?</p> <p>23 A. Correct.</p> <p>24 Q. Who is the they?</p> <p>25 A. The only person he mentioned at</p>

17 (Pages 62 - 65)

<p style="text-align: right;">Page 66</p> <p>1 WILSON</p> <p>2 that moment was Cory Robin.</p> <p>3 Q. Did he mention anyone else at</p> <p>4 any other time?</p> <p>5 A. No.</p> <p>6 Q. Now, you've drawn the outlines</p> <p>7 of your office, and you previously</p> <p>8 testified that the dimensions were 20 by</p> <p>9 15 I think you said?</p> <p>10 A. Approximately.</p> <p>11 Q. So it is approximately 20 feet</p> <p>12 north to south and 15 feet east to west;</p> <p>13 is that correct?</p> <p>14 A. North to south 20, 15</p> <p>15 approximately -- no. No. No. Yes, 20</p> <p>16 north to south and about 15 east to west.</p> <p>17 Q. All right. Now, did you have</p> <p>18 any furniture inside your office?</p> <p>19 A. Yes.</p> <p>20 Q. What did you have -- what</p> <p>21 furniture did you have inside your office?</p> <p>22 A. Desks, file cabinets,</p> <p>23 bookshelves, plants. Let's see.</p> <p>24 Chairs. I think that is it.</p> <p>25 Q. How many desks did you have?</p>	<p style="text-align: right;">Page 68</p> <p>1 WILSON</p> <p>2 A. I'm not sure. There may have</p> <p>3 been four.</p> <p>4 Q. What kind of file cabinets were</p> <p>5 these?</p> <p>6 A. Metal.</p> <p>7 Q. What were the approximate</p> <p>8 dimensions of these file cabinets?</p> <p>9 A. Let's see. Maybe three feet in</p> <p>10 length, maybe two and a half, three feet</p> <p>11 high, and maybe a foot and a half wide</p> <p>12 approximately.</p> <p>13 Q. And what was in these file</p> <p>14 cabinets?</p> <p>15 A. Records, documents, research.</p> <p>16 Q. Were they organized in any</p> <p>17 particular way?</p> <p>18 A. Yes.</p> <p>19 Q. What way?</p> <p>20 A. By title, by topic, by alphabet,</p> <p>21 depending on the file by chronology.</p> <p>22 Q. Anything else?</p> <p>23 A. Anything else in terms of what?</p> <p>24 Q. How these files were organized.</p> <p>25 A. Title, category, chronology. I</p>
<p style="text-align: right;">Page 67</p> <p>1 WILSON</p> <p>2 A. It would have been two desks.</p> <p>3 Q. Could you draw the location of</p> <p>4 those two desks, please?</p> <p>5 A. (Witness complies.)</p> <p>6 Q. And did those desks have chairs?</p> <p>7 A. Yes.</p> <p>8 Q. So the L indicates a chair</p> <p>9 behind the desk?</p> <p>10 A. Correct.</p> <p>11 Q. And did you use both of those</p> <p>12 desks?</p> <p>13 A. I did.</p> <p>14 Q. Now, you said there were file</p> <p>15 cabinets in your office?</p> <p>16 A. Yes.</p> <p>17 Q. How many file cabinets were</p> <p>18 there? Just tell me how many there</p> <p>19 were first.</p> <p>20 A. I have to think about it.</p> <p>21 MR. MARK KLEIN: Okay. Let the</p> <p>22 record reflect that Dr. Wilson has put Xs</p> <p>23 in three locations.</p> <p>24 Does that indicate the location</p> <p>25 of file cabinets?</p>	<p style="text-align: right;">Page 69</p> <p>1 WILSON</p> <p>2 think those would have been mainly --</p> <p>3 Q. Have you finished your answer?</p> <p>4 A. Yes.</p> <p>5 Q. You also had bookshelves in this</p> <p>6 office?</p> <p>7 A. Yes.</p> <p>8 Q. Where were the bookshelves? How</p> <p>9 many were there first of all?</p> <p>10 A. The entire wall was bookshelves</p> <p>11 wall to wall.</p> <p>12 Q. So the entire east wall?</p> <p>13 A. Floor to ceiling. Right.</p> <p>14 Q. The entire east wall?</p> <p>15 A. Right.</p> <p>16 Q. Were these bookshelves wooden or</p> <p>17 something else?</p> <p>18 A. They are wooden.</p> <p>19 Q. Were the books in all the</p> <p>20 shelves?</p> <p>21 A. Yes. Books, files, documents.</p> <p>22 Yes.</p> <p>23 Q. How were the books organized, if</p> <p>24 at all?</p> <p>25 A. Well, there was one shelf of</p>

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1 WILSON
2 what I would consider to be special books.
3 These were, for example, The Encyclopedia
4 of Protest and Revolution, which was an
5 eight-volume encyclopedia and on the shelf
6 with that and -- on that particular shelf
7 would have been other unique books to my
8 own research and my own professional
9 interests that, you know, authors would
10 provide to me and so forth.
11 Q. Where was the shelf of special
12 books?
13 A. If you come in through the door
14 and you go to the right, it would have
15 been on the bottom shelf closer to the
16 window.
17 Q. Could you use the initials SB
18 for special books where this shelf with
19 special books was located.
20 A. (Witness complies.) And I am not
21 sure whether it was the bottom shelf or
22 middle shelf, but there was -- I had a
23 shelf of special books.
24 Q. And approximately how many
25 special books were on the shelf of special

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1 WILSON
2 books?
3 A. Approximately a hundred.
4 Q. And approximately how many books
5 all together did you have on those
6 bookshelves?
7 A. Maybe a thousand books, 7, 800.
8 I can't say exactly.
9 Q. Did you ever create an inventory
10 of all the books you had on the shelves?
11 A. No.
12 Q. Did you ever create an inventory
13 of all the files you had?
14 A. No.
15 Q. Now, you had been in that office
16 for only three years; is that right?
17 A. A few years.
18 Q. Which was it, three or a few?
19 A. Approximately three. Three is
20 a few, isn't it?
21 Q. So approximately in 2009 you
22 moved into that office?
23 A. Maybe 2008.
24 Q. And where had all these files
25 and books been before 2008?

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1 WILSON
2 A. Well, some had been accumulated
3 since 2008, so -- so that's the answer.
4 Some -- these were not all from previous.
5 Some of these were accumulated since 2008.
6 Q. Okay. Those that you hadn't
7 accumulated since you moved into that
8 office, where had all these books and
9 files been when you moved -- before you
10 moved into that office in 2008?
11 A. Those were at -- in my office at
12 the Graduate Center For Worker Education
13 located at the 99 Hudson Street, and I
14 believe it was on the third floor.
15 Q. The space that the Graduate
16 Center For Worker Education had at 99
17 Hudson Street was less than 3,000 square
18 feet, correct?
19 A. I don't know the exact square
20 footage.
21 Q. What is your best approximation?
22 A. I mean I can only guess, so
23 I -- maybe 5,000 square feet. I don't
24 know exactly. 3,000, 5,000. I don't
25 know.

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1 WILSON
2 MR. JAMES KLEIN: Is that a
3 guess? Don't guess.
4 Q. You have no idea how many square
5 feet the Graduate Center For Worker
6 Education had at 99 Hudson Street. Is
7 that what your testimony is?
8 A. No, that's not my testimony. I
9 am giving you an approximation.
10 Q. What is your approximation?
11 What is your best approximation?
12 A. My approximation is about 3,000
13 to 4,000 square feet.
14 Q. And how big -- you had an office
15 at 99 Hudson Street, you personally?
16 A. Yes, personally I had an office.
17 Q. And what was the size of that
18 office approximately?
19 A. That office was approximately 20
20 feet by 20 feet.
21 Q. All right. Going back to Josh
22 Board, number 2 at the top of page 3 of
23 Exhibit 1, when was the last time you
24 spoke with Mr. Board?
25 A. I can't remember exactly.

<p style="text-align: right;">Page 74</p> <p>1 WILSON</p> <p>2 Q. What is your best recollection</p> <p>3 as to the last time you spoke to Mr.</p> <p>4 Board?</p> <p>5 A. Maybe in 2017.</p> <p>6 Q. And what was the occasion that</p> <p>7 you spoke to him in 2017?</p> <p>8 A. So I first asked how he was</p> <p>9 doing professionally, and he told me about</p> <p>10 his employment, and then I asked him if he</p> <p>11 remembered anything about his experience</p> <p>12 at -- as an employee at the Graduate</p> <p>13 Center For Worker Education.</p> <p>14 Q. And what did he tell you?</p> <p>15 A. He said that he remembered that</p> <p>16 the period when I was banned. He</p> <p>17 remembered in that period of time</p> <p>18 that -- that Cory Robin was insulting</p> <p>19 towards him. This is what he told me.</p> <p>20 Q. Did he provide you any</p> <p>21 additional information as to what files or</p> <p>22 papers were removed and thrown out?</p> <p>23 A. Not that I can recall.</p> <p>24 Q. Did Mr. Board ever tell you what</p> <p>25 papers had been removed and thrown out?</p>	<p style="text-align: right;">Page 76</p> <p>1 WILSON</p> <p>2 Guscott what information he had regarding</p> <p>3 what, if anything, was taken and destroyed</p> <p>4 of your property?</p> <p>5 A. Yes.</p> <p>6 Q. When?</p> <p>7 A. This would have been in February</p> <p>8 of 2012.</p> <p>9 Q. Is that the only conversation</p> <p>10 you had with Mr. Guscott regarding the</p> <p>11 theft and destruction of your property and</p> <p>12 mail?</p> <p>13 A. No, I've had a number -- a</p> <p>14 subsequent conversation with him.</p> <p>15 Q. All right. Let's start with</p> <p>16 February 2012. What did Mr. Guscott tell</p> <p>17 you regarding the alleged theft and</p> <p>18 destruction of your property at 25</p> <p>19 Broadway?</p> <p>20 A. So. Repeat the question again</p> <p>21 on Guscott.</p> <p>22 Q. You testified that you spoke</p> <p>23 with Mr. Guscott in February 2012</p> <p>24 regarding the alleged theft and</p> <p>25 destruction of your property at 25</p>
<p style="text-align: right;">Page 75</p> <p>1 WILSON</p> <p>2 A. Not specifically to my</p> <p>3 recollection.</p> <p>4 Q. The next person on the list is</p> <p>5 Kevin Guscott, G-U-S-C-O-T-T.</p> <p>6 A. Yes.</p> <p>7 Q. And he is listed here as having</p> <p>8 knowledge of "Witness to theft and</p> <p>9 destruction of plaintiff's property and</p> <p>10 mail at 25 Broadway." Do you see that?</p> <p>11 A. I see that.</p> <p>12 Q. To your knowledge, what</p> <p>13 information does Mr. Guscott have</p> <p>14 regarding that subject?</p> <p>15 A. To my knowledge, Kevin Guscott</p> <p>16 was an employee at 25 Broadway during that</p> <p>17 period, and so -- and he also was at the</p> <p>18 reception desk frequently at 25 Broadway,</p> <p>19 so he would have been privy to people</p> <p>20 coming in and out both -- well, let's see.</p> <p>21 Certainly the front door but also the</p> <p>22 administrative areas and -- so he would</p> <p>23 have seen people in and out of various</p> <p>24 offices.</p> <p>25 Q. Did you ever discuss with Mr.</p>	<p style="text-align: right;">Page 77</p> <p>1 WILSON</p> <p>2 Broadway, right?</p> <p>3 A. Correct.</p> <p>4 Q. What did he tell you then?</p> <p>5 A. He told me that people were in</p> <p>6 my office, and -- including people he</p> <p>7 didn't recognize, so that -- and he also</p> <p>8 mentioned that they were moving things</p> <p>9 around. They were throwing things out.</p> <p>10 Q. Anything else that he told you?</p> <p>11 A. He asked me what is going on.</p> <p>12 Q. Did he identify what people were</p> <p>13 in your office in this conversation of</p> <p>14 February 2012?</p> <p>15 A. I don't recall which people he</p> <p>16 mentioned, but -- and I am not sure he</p> <p>17 knew who the people were.</p> <p>18 Q. Did he identify any things that</p> <p>19 were thrown out?</p> <p>20 A. He didn't mention anything</p> <p>21 specifically.</p> <p>22 Q. Did you ask him?</p> <p>23 A. No, I didn't ask him what is</p> <p>24 being thrown out. No.</p> <p>25 Q. Did Mr. Guscott ever identify</p>

<p style="text-align: right;">Page 78</p> <p>1 WILSON</p> <p>2 any of the people who were then in your</p> <p>3 office?</p> <p>4 A. Well, he -- he said he didn't</p> <p>5 know some of them.</p> <p>6 Q. Did he identify any of them?</p> <p>7 A. He did not. People -- no, he</p> <p>8 didn't identify them specifically.</p> <p>9 Q. Did he ever identify anything</p> <p>10 that had been thrown out?</p> <p>11 A. Specifically, no.</p> <p>12 Q. Did he identify generally</p> <p>13 anything that had been thrown out?</p> <p>14 A. Papers.</p> <p>15 Q. Papers.</p> <p>16 Now, you testified that you have</p> <p>17 had conversations with Mr. Guscott since</p> <p>18 February of 2012. In any of these</p> <p>19 conversations, did he identify any of the</p> <p>20 people who had been in your office?</p> <p>21 A. Not to my recollection.</p> <p>22 Q. In any of these conversations</p> <p>23 since February of 2012, did Mr. Guscott</p> <p>24 identify any of the things that had been</p> <p>25 thrown out?</p>	<p style="text-align: right;">Page 80</p> <p>1 WILSON</p> <p>2 Q. Is it her former husband?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And for Mr. London you</p> <p>5 say, "Witnessed seizure and destruction of</p> <p>6 plaintiff's property at 25 Broadway." Do</p> <p>7 you see?</p> <p>8 A. Correct.</p> <p>9 Q. To the best of your knowledge,</p> <p>10 what information does Mr. London have</p> <p>11 regarding that subject?</p> <p>12 A. To the best of my</p> <p>13 knowledge -- well, first of all, he was an</p> <p>14 employee at 25 Broadway at the Graduate</p> <p>15 Center For Worker Education. He also</p> <p>16 worked at the front desk in the</p> <p>17 administrative area, and in that -- in</p> <p>18 those first few months or weeks following</p> <p>19 the raid and my banning from the 7th</p> <p>20 floor, he told me at that time that they</p> <p>21 were taking out boxes from my office</p> <p>22 and -- yes.</p> <p>23 Q. Did he identify who was taking</p> <p>24 out boxes?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 79</p> <p>1 WILSON</p> <p>2 A. No.</p> <p>3 Q. When was the last time you spoke</p> <p>4 with Mr. Guscott?</p> <p>5 A. At the beginning of this year,</p> <p>6 around New Year's.</p> <p>7 Q. And what was the occasion?</p> <p>8 A. New Year's greetings and he gave</p> <p>9 me an update on his graduate work, his</p> <p>10 master's program.</p> <p>11 Q. Did he call you or did you call</p> <p>12 him?</p> <p>13 A. He called me.</p> <p>14 Q. Okay, number 4 is Ron London.</p> <p>15 A. Yes.</p> <p>16 Q. Do you see that?</p> <p>17 A. I see that.</p> <p>18 Q. Is Ron London related to Annie</p> <p>19 London in any way?</p> <p>20 A. That's not a yes or no.</p> <p>21 Q. How is that? Is he related to</p> <p>22 Annie London?</p> <p>23 A. At the moment?</p> <p>24 Q. Yes.</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 81</p> <p>1 WILSON</p> <p>2 Q. Did you ask him who was taking</p> <p>3 out boxes?</p> <p>4 A. No.</p> <p>5 Q. Did he tell you what was in the</p> <p>6 boxes?</p> <p>7 A. He mentioned specifically</p> <p>8 papers.</p> <p>9 Q. Do you know what kind of papers</p> <p>10 he mentioned?</p> <p>11 A. At that time he said students'</p> <p>12 papers, my students' papers, master</p> <p>13 seminar papers.</p> <p>14 Q. How many boxes --</p> <p>15 MR. MARK KLEIN: Withdrawn.</p> <p>16 Q. Did Mr. London tell you how many</p> <p>17 boxes were being taken out?</p> <p>18 A. No.</p> <p>19 Q. Did you ask him how many boxes</p> <p>20 were being taken out?</p> <p>21 A. No.</p> <p>22 Q. When was the last time you spoke</p> <p>23 with Mr. London?</p> <p>24 A. I spoke with Mr. London a couple</p> <p>25 of weeks ago.</p>

21 (Pages 78 - 81)

<p style="text-align: right;">Page 82</p> <p>1 WILSON</p> <p>2 Q. What was the occasion?</p> <p>3 A. I asked him to reconsider and</p> <p>4 think hard and remember everything that</p> <p>5 happened because I may want him to be a</p> <p>6 witness in this case.</p> <p>7 Q. Did he tell you anything that he</p> <p>8 recalled about what had happened?</p> <p>9 A. We didn't discuss the details.</p> <p>10 He just said he would be willing to be a</p> <p>11 witness.</p> <p>12 Q. Now, other than telling you that</p> <p>13 master seminar papers had been taken, did</p> <p>14 Mr. London identify anything else that had</p> <p>15 been taken out of your office?</p> <p>16 A. No, that -- that I can remember.</p> <p>17 Q. Now, you testified previously</p> <p>18 that at a meeting you were informed that</p> <p>19 you were banned from the Graduate Center</p> <p>20 For Worker Education, correct?</p> <p>21 A. Yes.</p> <p>22 Q. When did this meeting take</p> <p>23 place?</p> <p>24 A. That meeting was the last</p> <p>25 January -- I mean -- I'm sorry. The last</p>	<p style="text-align: right;">Page 84</p> <p>1 WILSON</p> <p>2 A. Yes, President Gould.</p> <p>3 Q. What did she tell you?</p> <p>4 A. She said I was under</p> <p>5 investigation.</p> <p>6 Q. Did she tell you what you were</p> <p>7 under investigation for?</p> <p>8 A. No.</p> <p>9 Q. Did you ask?</p> <p>10 A. Yes.</p> <p>11 Q. Did your attorney ask?</p> <p>12 A. Yes.</p> <p>13 Q. And what were you told, if</p> <p>14 anything?</p> <p>15 A. Nothing. Nothing specific.</p> <p>16 Q. Were you banned just from the</p> <p>17 graduate center or also from the Brooklyn</p> <p>18 College campus?</p> <p>19 A. I was also banned from the main</p> <p>20 campus.</p> <p>21 Q. Do you recall anything that you</p> <p>22 or your attorney said to the other people</p> <p>23 who were present at the meeting during</p> <p>24 this meeting on the last Friday of January</p> <p>25 2012 in --</p>
<p style="text-align: right;">Page 83</p> <p>1 WILSON</p> <p>2 Friday of January 2012.</p> <p>3 Q. Where did this meeting take</p> <p>4 place?</p> <p>5 A. On the main campus at Brooklyn</p> <p>6 College.</p> <p>7 Q. At whose office, if anyone's?</p> <p>8 A. It may have been -- it was one</p> <p>9 of the president's offices, president</p> <p>10 Karen Gould.</p> <p>11 Q. And who was present at the</p> <p>12 meeting?</p> <p>13 A. Let's see. Pete Zwiebach,</p> <p>14 Karen Gould, Provost Tramontano, Pam</p> <p>15 Pollack. I think Michael Hewitt was there.</p> <p>16 Let's see. I think Dean Phillips was</p> <p>17 there. Let's see. I think that was</p> <p>18 about it.</p> <p>19 Q. And how long after the "Raid"</p> <p>20 did this meeting take place at President</p> <p>21 Gould's offices?</p> <p>22 A. Several days.</p> <p>23 Q. Did anyone tell you what was</p> <p>24 going on during this meeting in President</p> <p>25 Gould's office?</p>	<p style="text-align: right;">Page 85</p> <p>1 WILSON</p> <p>2 A. Yes.</p> <p>3 Q. -- in President Gould's office?</p> <p>4 A. Yes.</p> <p>5 Q. What?</p> <p>6 A. There was a particular issue</p> <p>7 about plagiarism and -- and there were</p> <p>8 some other remarks that Dean Phillips was</p> <p>9 making, and my recollection is that at</p> <p>10 that meeting Zwiebach admonished Dean</p> <p>11 Phillips for making the accusations of</p> <p>12 plagiarism, and -- because he had heard</p> <p>13 that she had been making these to multiple</p> <p>14 people, and -- and so I think the -- as I</p> <p>15 recall, the president noted that, and that</p> <p>16 was the -- I think that was the main issue</p> <p>17 that I recall at that time. So my</p> <p>18 understanding was that this -- there was</p> <p>19 something going on with plagiarism, so</p> <p>20 that was --</p> <p>21 Q. Was there any description of who</p> <p>22 was allegedly engaging in plagiarism?</p> <p>23 A. None. Me. Me.</p> <p>24 Q. You personally were engaging in</p> <p>25 plagiarism?</p>

22 (Pages 82 - 85)

<p style="text-align: right;">Page 86</p> <p>1 WILSON</p> <p>2 A. Yes.</p> <p>3 Q. Do you recall whether the</p> <p>4 allegation --</p> <p>5 MR. MARK KLEIN: Withdrawn.</p> <p>6 Q. Did anyone say how you were</p> <p>7 allegedly engaging in plagiarism?</p> <p>8 A. Well, I mean when you say</p> <p>9 anyone, what do you mean by anyone?</p> <p>10 Q. At this meeting.</p> <p>11 A. No. At that meeting, no.</p> <p>12 Q. Now, a few minutes ago you</p> <p>13 testified that Ron London said that boxes</p> <p>14 were being removed, and that the boxes</p> <p>15 contained graduate student papers, right?</p> <p>16 A. Right.</p> <p>17 Q. Did Mr. London tell you how he</p> <p>18 knew that there were graduate student</p> <p>19 papers in the boxes?</p> <p>20 A. He didn't tell me how he knew.</p> <p>21 Q. Did you ask him how he knew?</p> <p>22 A. No.</p> <p>23 Q. And he didn't tell you how many</p> <p>24 boxes were being removed?</p> <p>25 A. He didn't tell me how many</p>	<p style="text-align: right;">Page 88</p> <p>1 WILSON</p> <p>2 are -- we are talking about bound archival</p> <p>3 records of students' terminal work.</p> <p>4 Q. Now, did you consider these</p> <p>5 students papers, these graduate students</p> <p>6 papers to be your property?</p> <p>7 A. These would be</p> <p>8 institution -- well two things --</p> <p>9 Q. Answer my question. Did you</p> <p>10 consider these students --</p> <p>11 A. Not personal property.</p> <p>12 Q. Okay. And the ten or fifteen</p> <p>13 bound volumes, did you consider --</p> <p>14 MR. MARK KLEIN: Withdrawn.</p> <p>15 Q. These ten or fifteen bound</p> <p>16 volumes of graduate students papers, did</p> <p>17 you consider those to be your personal</p> <p>18 property?</p> <p>19 A. No.</p> <p>20 Q. Directing your attention back to</p> <p>21 Exhibit 1, item 5, you identify Jose</p> <p>22 Vargas, and it says, "Witnessed the</p> <p>23 seizure of plaintiff's computer equipment</p> <p>24 at 25 Broadway." Do you see that?</p> <p>25 A. Yes. Sorry. Number 5, "former</p>
<p style="text-align: right;">Page 87</p> <p>1 WILSON</p> <p>2 boxes.</p> <p>3 Q. And you didn't ask him?</p> <p>4 A. I didn't need to ask him.</p> <p>5 Q. Why is that?</p> <p>6 A. Because we had hundreds of</p> <p>7 graduate papers, and one could only</p> <p>8 imagine it would be many boxes.</p> <p>9 Q. And were these graduate student</p> <p>10 papers in your office, the office that you</p> <p>11 have drawn and that has been marked as</p> <p>12 exhibit 2?</p> <p>13 A. They were in various areas,</p> <p>14 including my office.</p> <p>15 Q. Where were they in your office?</p> <p>16 A. They would have been in various</p> <p>17 locations in my office on my desk to</p> <p>18 review student's work. As I recall,</p> <p>19 there was a box of student papers in my</p> <p>20 office. I can't tell you precisely</p> <p>21 where, but there was a box of student</p> <p>22 papers, and then on my bookshelf I had a</p> <p>23 number of the archived papers that I would</p> <p>24 have used for references, maybe ten or</p> <p>25 fifteen bound volumes, because these</p>	<p style="text-align: right;">Page 89</p> <p>1 WILSON</p> <p>2 employee witness to seizure of plaintiff's</p> <p>3 computer equipment. Correct.</p> <p>4 Q. And why do you list Mr. Vargas</p> <p>5 here?</p> <p>6 A. Well, Mr. Vargas --</p> <p>7 MR. JAMES KLEIN: I think that</p> <p>8 is a compound question.</p> <p>9 MR. MARK KLEIN: Okay. Your</p> <p>10 objection is noted.</p> <p>11 Q. Can you answer?</p> <p>12 A. Mr. Vargas was an employee at</p> <p>13 that time at 25 Broadway, and he was our</p> <p>14 tech person, tech support. Technician.</p> <p>15 Q. Did you ever have any</p> <p>16 conversation with Mr. Vargas regarding the</p> <p>17 "Seizure of plaintiff's computer equipment</p> <p>18 at 25 Broadway"?</p> <p>19 A. Yes, I did.</p> <p>20 Q. When?</p> <p>21 A. That would have been in February</p> <p>22 of 2012.</p> <p>23 Q. Now, what is the computer</p> <p>24 equipment that was yours that was seized?</p> <p>25 A. Well, let's -- I would have to</p>

23 (Pages 86 - 89)

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1 WILSON
2 make a distinction. Computer equipment
3 was computer equipment that I was using,
4 but legally it was owned by the City
5 University. So it wasn't personal
6 property, if that is your question.
7 Q. Well, I am asking you if you can
8 identify what the "Plaintiff's computer
9 equipment at 25 Broadway" was.
10 A. There were laptops and an iPad
11 that I used that he told me were seized,
12 and he told me that -- yes. He told me
13 they were seized.
14 Q. The laptop and iPad, was those
15 your personal property?
16 A. They were owned by the
17 university.
18 Q. Okay. When was the last time
19 you spoke with Mr. Vargas?
20 A. Also around New Year's.
21 Q. Of this year?
22 A. Yes.
23 Q. Did you have a New Year's party
24 in which all these people came, and you
25 talked about the case?

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1 WILSON
2 A. I had no New Year's party.
3 Q. Did you contact him about being
4 a witness in this case?
5 A. Yes, I did.
6 Q. What did he tell you?
7 A. He said he would be happy to
8 cooperate to the best of his recollection.
9 Q. And so Mr. Vargas is going to
10 testify about how the computer equipment
11 that was owned by Brooklyn College and
12 that you used was taken?
13 A. Yes.
14 Q. Is he going to testify about
15 anything else?
16 A. I don't know.
17 Q. The next person listed is
18 Madonna Charles?
19 A. Yes.
20 Q. And it says here "She
21 participated in confiscation of
22 plaintiff's mail. Under administrative
23 direction, Charles was told to confiscate
24 Wilson's mail." That is what it says?
25 A. Right.

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1 WILSON
2 Q. What told Ms. Charles to
3 confiscate the mail?
4 A. You will have to ask
5 Ms. Charles.
6 Q. Did Ms. Charles ever tell you
7 who told her to confiscate your mail?
8 A. She told me the administration
9 directed her.
10 Q. When did she tell you that?
11 A. She told me that in 2012.
12 Q. When was the last time you spoke
13 with Ms. Charles?
14 A. About a month ago.
15 Q. Did you ask her if she would be
16 a witness in this case?
17 A. Yes -- no, I didn't ask her if
18 she would be a witness.
19 Q. What did you ask her?
20 A. I asked her if she remembered
21 taking my property, seizing my mail, my
22 U.S. mail.
23 Q. And what did she say?
24 A. She remembered.
25 Q. She said yes, I seized your

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1 WILSON
2 mail?
3 A. No, that is not what she said.
4 Q. What did she say?
5 A. She said she remembered. She
6 was directed to take it.
7 Q. Did she tell you who had
8 directed her to take your mail?
9 A. Not specifically.
10 Q. Did she tell you that she was
11 directed to "Confiscate and take your
12 mail"?
13 A. She didn't use the word
14 confiscate. She used the word take.
15 Q. Did you ask her what was done
16 with the mail that she took?
17 A. I did.
18 Q. What did she tell you?
19 A. She didn't remember.
20 Q. And at no time has Ms. Charles
21 identified who directed her to take your
22 mail; is that right?
23 A. No. Correct.
24 Q. The next person listed is Mina,
25 M-I-N-A, of the PBM cleaning staff; is

<p style="text-align: right;">Page 94</p> <p>1 WILSON</p> <p>2 that right?</p> <p>3 A. Yes.</p> <p>4 Q. And under her name it says</p> <p>5 "witness to destruction of plaintiff's</p> <p>6 property at 25 Broadway." Right?</p> <p>7 A. Correct.</p> <p>8 Q. Does Mina presently work at 25</p> <p>9 Broadway to your knowledge?</p> <p>10 A. To my knowledge she does.</p> <p>11 Q. And when was the last time you</p> <p>12 spoke with her?</p> <p>13 A. In 2011.</p> <p>14 Q. How is it that you spoke to her</p> <p>15 in 2011?</p> <p>16 A. I would see her on a regular</p> <p>17 basis at 25 Broadway.</p> <p>18 Q. So the last time you spoke to</p> <p>19 her was before the "Raid"?</p> <p>20 A. Correct.</p> <p>21 Q. How is it that you believe that</p> <p>22 Mina has --</p> <p>23 MR. MARK KLEIN: Withdrawn.</p> <p>24 Q. How is it that you believe Mina</p> <p>25 had "witnessed destruction of plaintiff's</p>	<p style="text-align: right;">Page 96</p> <p>1 WILSON</p> <p>2 you that Mina had complained about there</p> <p>3 being so many papers in the containers</p> <p>4 that she couldn't throw them out?</p> <p>5 A. It may have been one of the</p> <p>6 other cleaning personnel on that floor who</p> <p>7 I ran into on the way to the 8th floor.</p> <p>8 I don't remember specifically, but I</p> <p>9 remember the phenomena of her saying that</p> <p>10 there were so much volume and weight and</p> <p>11 such an extensive, you know, tossing of</p> <p>12 material that to me -- I was, you</p> <p>13 know -- I focused on that. I was</p> <p>14 concerned on that, but no, I didn't speak</p> <p>15 to her directly.</p> <p>16 Q. Number 8, you identify Pete</p> <p>17 Zwiebach -- and by the way that is</p> <p>18 Z-W-I-E-B-E-C-K at least at it is spelled</p> <p>19 here, right, Dr. Wilson?</p> <p>20 A. That's what appears here.</p> <p>21 Q. Is that the correct spelling of</p> <p>22 his name to your knowledge?</p> <p>23 A. I'm not positive if that is a</p> <p>24 correct spelling.</p> <p>25 Q. You identify Mr. Zwiebach as</p>
<p style="text-align: right;">Page 95</p> <p>1 WILSON</p> <p>2 property at 25 Broadway"?</p> <p>3 A. Because in 2012 an</p> <p>4 administrator, and I don't recall who,</p> <p>5 told me that -- because I -- I was in that</p> <p>6 area. I was in the -- I actually was</p> <p>7 teaching upstairs on the 8th floor. I was</p> <p>8 banned on the 7th floor, but I was</p> <p>9 teaching on the 8th floor, and an</p> <p>10 administrator or one of the cleaning</p> <p>11 personnel, somebody told me that Mina</p> <p>12 complained because they were throwing out</p> <p>13 such a large volume of material from my</p> <p>14 office and from the administrative offices</p> <p>15 that she was unable physically to empty</p> <p>16 the containers, and that's -- that was the</p> <p>17 gist of my understanding of what she said.</p> <p>18 Q. Do you know what was in the</p> <p>19 containers that Mina was unable --</p> <p>20 A. Papers. Papers. Papers.</p> <p>21 Q. Do you know what kind of papers?</p> <p>22 A. No.</p> <p>23 Q. Anything else?</p> <p>24 A. No.</p> <p>25 Q. And you don't recall who told</p>	<p style="text-align: right;">Page 97</p> <p>1 WILSON</p> <p>2 having "witnessed seizure/conversion of</p> <p>3 mail and property, witness to defamatory</p> <p>4 criminal charges." Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. What "seizure/conversion of mail</p> <p>7 and property" did Mr. Zwiebach witness?</p> <p>8 A. Well --</p> <p>9 MR. JAMES KLEIN: I am going to</p> <p>10 object as to any issue that arises</p> <p>11 relative to the attorney-client privilege.</p> <p>12 Certainly he can talk about facts, but</p> <p>13 anything regarding any legal conclusion or</p> <p>14 anything related to their attorney-client</p> <p>15 relationship I am objecting to.</p> <p>16 MR. MARK KLEIN: I asked him to</p> <p>17 tell me what seizure/conversion of male</p> <p>18 and property Mr. Zwiebach witnessed. I</p> <p>19 am not asking for legal conclusions or</p> <p>20 communications. I am asking just what I</p> <p>21 asked.</p> <p>22 A. So Pete had occasion to view the</p> <p>23 defamatory charges made in the New York</p> <p>24 Times and in other venues.</p> <p>25 Q. All right. Let's take those</p>

25 (Pages 94 - 97)

<p style="text-align: right;">Page 98</p> <p>1 WILSON</p> <p>2 one at a time. You said that Mr.</p> <p>3 Zwiebach viewed the property that had been</p> <p>4 seized?</p> <p>5 A. Yes.</p> <p>6 Q. When did he view that property?</p> <p>7 A. You would have to ask Mr.</p> <p>8 Zwiebach.</p> <p>9 Q. Were these on occasions when</p> <p>10 when Mr. Zwiebach came to Brooklyn College</p> <p>11 to look at the boxes of your materials</p> <p>12 that Brooklyn College was storing?</p> <p>13 A. These were occasions when Mr.</p> <p>14 Zwiebach looked at the materials in</p> <p>15 different locations of my materials that</p> <p>16 Brooklyn College seized.</p> <p>17 Q. How many different locations did</p> <p>18 Mr. Zwiebach look at materials?</p> <p>19 MR. YONG: If you know.</p> <p>20 MR. JAMES KLEIN: I am going to</p> <p>21 object. He doesn't know what Mr.</p> <p>22 Zwiebach looked at.</p> <p>23 Q. Did Mr. Zwiebach ever tell you</p> <p>24 what locations he looked at materials?</p> <p>25 A. I think he mentioned three or</p>	<p style="text-align: right;">Page 100</p> <p>1 WILSON</p> <p>2 been taken from your office?</p> <p>3 A. So one was in Boylan Hall.</p> <p>4 Q. And that is on the Brooklyn</p> <p>5 campus of Brooklyn College; is that right?</p> <p>6 A. That's correct. That is the</p> <p>7 name of the building.</p> <p>8 Q. And where in Boylan Hall did you</p> <p>9 view materials?</p> <p>10 A. That would have been on the</p> <p>11 first floor of Boylan Hall in one of the</p> <p>12 conference rooms of the Office of Business</p> <p>13 and Physical Services, as I recall. That</p> <p>14 would be -- and I mean there is another</p> <p>15 location that I recall, but -- nearby,</p> <p>16 but -- so there was -- and Pete was there</p> <p>17 as well, but that is another location down</p> <p>18 the hall in Pam Pollack's office on the</p> <p>19 first floor of Boylan Hall.</p> <p>20 Q. So you are saying that you and</p> <p>21 Mr. Zwiebach reviewed documents in two</p> <p>22 different locations in Boylan Hall, one in</p> <p>23 Pam Pollack's office and one in the</p> <p>24 conference room?</p> <p>25 A. No, that is not what I said. I</p>
<p style="text-align: right;">Page 99</p> <p>1 WILSON</p> <p>2 four different locations.</p> <p>3 Q. What three or four locations?</p> <p>4 A. I believe he said CUNY Central,</p> <p>5 and I believe he said Africana studies.</p> <p>6 In fact, I am sure he said Africana</p> <p>7 studies, and I am sure he viewed documents</p> <p>8 in -- in Boylan Hall. Those are the ones</p> <p>9 I am aware of. There may have been</p> <p>10 others.</p> <p>11 Q. Did you ever accompany Mr.</p> <p>12 Zwiebach in any of the instances in which</p> <p>13 he viewed the materials that had been</p> <p>14 taken from your office?</p> <p>15 A. Yes, on two occasions as I</p> <p>16 recall.</p> <p>17 Q. And what were those two</p> <p>18 occasions?</p> <p>19 A. Those -- I don't recall the</p> <p>20 exact dates if that is your question.</p> <p>21 Q. Where were the two occasions --</p> <p>22 MR. MARK KLEIN: Withdrawn.</p> <p>23 Q. What were the locations of the</p> <p>24 two occasions that you accompanied Mr.</p> <p>25 Zwiebach and reviewed materials that had</p>	<p style="text-align: right;">Page 101</p> <p>1 WILSON</p> <p>2 said we reviewed them in one office, which</p> <p>3 was in the conference room of Business and</p> <p>4 Physical Services. We reviewed</p> <p>5 documents, but we went into Pam Pollack's</p> <p>6 office, and I viewed -- not reviewed. I</p> <p>7 saw documents -- my documents, some of my</p> <p>8 documents in her office.</p> <p>9 Q. Okay. When did you review</p> <p>10 documents that were in a conference room</p> <p>11 in Boylan Hall along with Mr. Zwiebach?</p> <p>12 A. I think this would have been</p> <p>13 sometime in 2015 or 2014.</p> <p>14 Q. And what files did you review at</p> <p>15 that time? When you went to the conference</p> <p>16 room in Boylan Hall?</p> <p>17 A. Those were mainly administrative</p> <p>18 files.</p> <p>19 Q. When you say administrative</p> <p>20 files, what do you mean?</p> <p>21 A. I mean personnel records,</p> <p>22 employee documents, some student files,</p> <p>23 travel files with passport information,</p> <p>24 and -- information about various programs</p> <p>25 I was involved in, you know,</p>

<p style="text-align: right;">Page 102</p> <p>1 WILSON</p> <p>2 like the -- like the mail initiative</p> <p>3 program. There were some files at the</p> <p>4 Center For Diversity and -- but there were</p> <p>5 no -- my research wasn't there. My</p> <p>6 letters weren't there. My lectures</p> <p>7 weren't there. You know, my -- now, I do</p> <p>8 remember a camera that was my personal</p> <p>9 camera being in one of the -- the open</p> <p>10 boxes that we examined, and the boxes were</p> <p>11 disheveled. They weren't categorized.</p> <p>12 Everything was not in an envelope. So it</p> <p>13 was like chaotic, irregular boxes stacked</p> <p>14 up, you know, and I don't know how many</p> <p>15 boxes there were, but they were open,</p> <p>16 unnumbered, unlabeled, and I do remember a</p> <p>17 personal camera that I owned was in one of</p> <p>18 the boxes. And --</p> <p>19 Q. You say your lecture notes</p> <p>20 weren't there, and your research wasn't</p> <p>21 there?</p> <p>22 A. No, and my letters weren't</p> <p>23 there, and -- and my manuscripts weren't</p> <p>24 there, and in fact my boxes weren't there.</p> <p>25 Q. And did you say anything to</p>	<p style="text-align: right;">Page 104</p> <p>1 WILSON</p> <p>2 he had.</p> <p>3 Q. Do you have any knowledge as to</p> <p>4 whether Mr. Zwiebach or Mr. Moore</p> <p>5 complained to anyone about your stuff not</p> <p>6 being there?</p> <p>7 A. Yes, Mr. Zwiebach did.</p> <p>8 Q. And did he do that orally or in</p> <p>9 writing to your knowledge?</p> <p>10 A. Both.</p> <p>11 Q. And who did he do that to?</p> <p>12 A. I don't know all the people he</p> <p>13 complained to.</p> <p>14 MR. JAMES KLEIN: The form of</p> <p>15 the question is --</p> <p>16 Q. Do you know anybody that Mr.</p> <p>17 Zwiebach complained to about missing</p> <p>18 stuff?</p> <p>19 MR. JAMES KLEIN: When you say</p> <p>20 know, that's -- does he know the person</p> <p>21 individually?</p> <p>22 MR. MARK KLEIN: Could you read</p> <p>23 back the question, please.</p> <p>24 (Record read.)</p> <p>25 A. I believe Michael Hewitt. That</p>
<p style="text-align: right;">Page 103</p> <p>1 WILSON</p> <p>2 anybody about where were your books,</p> <p>3 manuscripts, lectures and research?</p> <p>4 A. Absolutely. I said to Pete</p> <p>5 where is my stuff. Where is my stuff,</p> <p>6 and he said --</p> <p>7 MR. JAMES KLEIN: Don't say it.</p> <p>8 No. He is your attorney.</p> <p>9 THE WITNESS: Yes.</p> <p>10 Q. Did you say anything to anyone</p> <p>11 besides your attorney besides where is</p> <p>12 your stuff ?</p> <p>13 A. To my other attorney at that</p> <p>14 time.</p> <p>15 Q. Who was your attorney at that</p> <p>16 time?</p> <p>17 A. At that time Collin Moore.</p> <p>18 Q. Okay. To your knowledge, did</p> <p>19 either Mr. Zwiebach or Mr. Moore say</p> <p>20 anything to anybody about where your</p> <p>21 books, manuscripts, lectures, research and</p> <p>22 letters were?</p> <p>23 MR. JAMES KLEIN: I am going to</p> <p>24 object to that as to any information he</p> <p>25 has about that based on any conversations</p>	<p style="text-align: right;">Page 105</p> <p>1 WILSON</p> <p>2 is who I know. And -- and he also</p> <p>3 mentioned it to Pam Pollack, and I</p> <p>4 believe -- and I am sure -- well I can't</p> <p>5 say I am sure. I think he spoke to a</p> <p>6 Ms. --</p> <p>7 MR. JAMES KLEIN: Hold on. If</p> <p>8 this is -- if any of these are the</p> <p>9 basis -- you know, based on anything that</p> <p>10 Mr. Zwiebach told you as your attorney, it</p> <p>11 is privileged.</p> <p>12 THE WITNESS: I see. Right.</p> <p>13 Q. Have you ever seen an e-mail</p> <p>14 from Mr. Zwiebach to anybody complaining</p> <p>15 about your books, manuscripts, lecture</p> <p>16 notes, research or letters being missing?</p> <p>17 A. I can't recall at this moment.</p> <p>18 Q. Did you ask Mr. Zwiebach to send</p> <p>19 such an e-mail?</p> <p>20 MR. JAMES KLEIN: That is</p> <p>21 privileged.</p> <p>22 Q. Did you review these boxes in</p> <p>23 one of the conference rooms in Boylan Hall</p> <p>24 in connection with the arbitration in this</p> <p>25 case that you had with Brooklyn College</p>

27 (Pages 102 - 105)

<p style="text-align: right;">Page 106</p> <p>1 WILSON</p> <p>2 and CUNY?</p> <p>3 A. Yes.</p> <p>4 Q. So you reviewed these materials</p> <p>5 in preparation for that arbitration; is</p> <p>6 that right?</p> <p>7 MR. JAMES KLEIN: I believe</p> <p>8 that is privileged.</p> <p>9 MR. MARK KLEIN: I am trying to</p> <p>10 set in time when this took place. He</p> <p>11 said it was sometime in 2014.</p> <p>12 MR. JAMES KLEIN: You are asking</p> <p>13 for preparations in his legal proceedings.</p> <p>14 Q. You said it was sometime in 2014</p> <p>15 or 2015. Could you be any more specific?</p> <p>16 A. Not at this moment.</p> <p>17 Q. Now, you also testified that Mr.</p> <p>18 Zwiebach reviewed materials in Africana</p> <p>19 studies, correct?</p> <p>20 A. Correct.</p> <p>21 Q. That is at James Hall in</p> <p>22 Brooklyn College at the Brooklyn campus?</p> <p>23 A. That's correct.</p> <p>24 Q. Were you present when Mr.</p> <p>25 Zwiebach reviewed materials in Africana</p>	<p style="text-align: right;">Page 108</p> <p>1 WILSON</p> <p>2 summers. That's correct incorrect.</p> <p>3 Q. But during the school year?</p> <p>4 A. At various times.</p> <p>5 Q. All right. Now, at this</p> <p>6 occasion that you and Mr. Zwiebach went to</p> <p>7 Africana studies in 2014 or 2015, did you</p> <p>8 see any of your books, manuscripts,</p> <p>9 lectures, research, notes or letters?</p> <p>10 A. No.</p> <p>11 Q. Who gave you access to these</p> <p>12 materials in Africana studies?</p> <p>13 A. As I recall, a Brooklyn College</p> <p>14 security guard opened the door for us, as</p> <p>15 I recall. I don't know who, but that is</p> <p>16 my recollection.</p> <p>17 Q. Do you have any understanding as</p> <p>18 to how these materials had gotten to</p> <p>19 Africana studies in order for you and Mr.</p> <p>20 Zwiebach to review them?</p> <p>21 A. Yes, I do.</p> <p>22 Q. And what is your understanding?</p> <p>23 A. Let me just think about that for</p> <p>24 a minute. Actually my understanding -- I</p> <p>25 don't know exactly how that stuff got</p>
<p style="text-align: right;">Page 107</p> <p>1 WILSON</p> <p>2 studies?</p> <p>3 A. On one occasion, yes.</p> <p>4 Q. And when was that as best you</p> <p>5 can recall?</p> <p>6 A. I don't remember the exact date.</p> <p>7 It would have been probably in 2014 or</p> <p>8 2015.</p> <p>9 Q. And what materials did you</p> <p>10 review in 2014 or 2015 when you and Mr.</p> <p>11 Zwiebach went to Africana studies?</p> <p>12 A. These would have been travel</p> <p>13 records with, you know, student</p> <p>14 information, correspondence with the</p> <p>15 travel agency, maybe ticketing</p> <p>16 information. There may have been -- oh,</p> <p>17 employee timesheets. There were</p> <p>18 activities of the various programs,</p> <p>19 events --</p> <p>20 Q. These are all materials in</p> <p>21 connection with trips you had taken with</p> <p>22 the Graduate Center For Worker Education</p> <p>23 students during various summers; is that</p> <p>24 right?</p> <p>25 A. That's correct. Not during the</p>	<p style="text-align: right;">Page 109</p> <p>1 WILSON</p> <p>2 there, so the answer is no. I don't know</p> <p>3 exactly how they got there.</p> <p>4 Q. Were these materials in George</p> <p>5 Cunningham's office in Africana studies?</p> <p>6 A. I am not sure whose office it</p> <p>7 was in at that time. I think it might</p> <p>8 have been a different office I</p> <p>9 think or -- but I am not sure which office</p> <p>10 it was.</p> <p>11 Q. Is it your testimony you never</p> <p>12 asked that your materials be put in George</p> <p>13 Cunningham's office at Africana studies?</p> <p>14 A. Well, my my testimony is that</p> <p>15 some of my materials were in Paisley</p> <p>16 Currah's storage closet for some period of</p> <p>17 time, and I don't know what was in there,</p> <p>18 and I was contacted, and I don't remember</p> <p>19 precisely by whom, but that they wanted</p> <p>20 move my stuff, and so I -- because of</p> <p>21 the -- because Paisley had been accusing</p> <p>22 me of stealing millions of dollars,</p> <p>23 because Paisley had been accusing me of</p> <p>24 plagiarism and other things that I was</p> <p>25 very concerned about them moving my stuff</p>

28 (Pages 106 - 109)

<p style="text-align: right;">Page 110</p> <p>1 WILSON</p> <p>2 anywhere because I figured that is just</p> <p>3 problematic. So -- so I went to observe</p> <p>4 these things, some of the things that were</p> <p>5 in Paisley's office in the public -- there</p> <p>6 is like a public lounge and a storage</p> <p>7 closet.</p> <p>8 Q. Okay.</p> <p>9 A. So -- yes.</p> <p>10 Q. You referred to Paisley's</p> <p>11 storage closet, right?</p> <p>12 A. The department of political</p> <p>13 science to be more precise.</p> <p>14 Q. So what you are talking about is</p> <p>15 a storage closet off the faculty lounge</p> <p>16 for the department of political science,</p> <p>17 right?</p> <p>18 A. That's correct.</p> <p>19 Q. To your knowledge, is this</p> <p>20 storage closet locked?</p> <p>21 A. Yes and no.</p> <p>22 Q. Are you aware of any time in</p> <p>23 which it was not locked?</p> <p>24 A. Of course.</p> <p>25 Q. While your materials were in</p>	<p style="text-align: right;">Page 112</p> <p>1 WILSON</p> <p>2 Q. You don't know?</p> <p>3 A. I am not sure.</p> <p>4 Q. If you look at the description</p> <p>5 on page 3 of Exhibit 1 with regard to Pete</p> <p>6 Zwiebach, there is a reference to March of</p> <p>7 2016 there. Do you see that?</p> <p>8 A. Yes. March of 2016, right.</p> <p>9 Q. And it doesn't appear to be a</p> <p>10 complete sentence, but there is a</p> <p>11 reference to "obtains his property until</p> <p>12 March of 2016"?</p> <p>13 A. Right.</p> <p>14 Q. And so you obtained your</p> <p>15 property in March of 2016?</p> <p>16 A. I never obtained my property.</p> <p>17 Q. So what do the words obtains his</p> <p>18 property until March 2016 mean here?</p> <p>19 A. So I was terminated in February</p> <p>20 of 2016, and I wanted to make arrangements</p> <p>21 to pick up whatever was left over, the</p> <p>22 remnants, whatever they had. Again, I had</p> <p>23 no idea what was there, and so it took a</p> <p>24 couple of months for them even to make</p> <p>25 arrangements for me to pick up the</p>
<p style="text-align: right;">Page 111</p> <p>1 WILSON</p> <p>2 there?</p> <p>3 A. Yes.</p> <p>4 Q. And how do you know that?</p> <p>5 A. Well, first because of the</p> <p>6 pattern and practice that it wasn't just</p> <p>7 for my materials, but it was to store</p> <p>8 coffee, tea, sugar, garbage bags. I mean</p> <p>9 and it was a lounge, and so the practice</p> <p>10 was that door was open frequently. For</p> <p>11 years, for decades it was open and closed,</p> <p>12 open and closed, so that is how I know.</p> <p>13 So that was the common practice, and on</p> <p>14 the day that I arrived there to watch my</p> <p>15 materials being transferred when I arrived</p> <p>16 the door was open, and not only was the</p> <p>17 door open but I recognized that one of my</p> <p>18 computers was outside in the lounge on the</p> <p>19 floor.</p> <p>20 Q. When did you come to Brooklyn</p> <p>21 College to look at the movement of your</p> <p>22 materials from the storage closet?</p> <p>23 A. I don't recall the exact date.</p> <p>24 Q. Do you know what year it was?</p> <p>25 A. Maybe it was 2014.</p>	<p style="text-align: right;">Page 113</p> <p>1 WILSON</p> <p>2 leftovers.</p> <p>3 Q. Going back to when you and Mr.</p> <p>4 Zwiebach reviews materials at Africana</p> <p>5 studies, which you said took place in 2014</p> <p>6 or 2015, you testified, right, that your</p> <p>7 books, manuscripts, lectures, research</p> <p>8 notes, and letters were not present then?</p> <p>9 A. That's right.</p> <p>10 MR. JAMES KLEIN: You said they</p> <p>11 were not present in Boylan Hall.</p> <p>12 THE WITNESS: In Boylan Hall.</p> <p>13 Q. Were they also present in</p> <p>14 Africana studies?</p> <p>15 A. I never saw them at any time.</p> <p>16 Q. Did you ask anybody where those</p> <p>17 materials were?</p> <p>18 A. Yes, I asked Pete.</p> <p>19 Q. And to your knowledge, did Mr.</p> <p>20 Zwiebach complain to anyone or ask where</p> <p>21 those materials were?</p> <p>22 A. I asked him to complain.</p> <p>23 Q. Do you know if he did?</p> <p>24 A. I think he did, but I don't know</p> <p>25 for a fact.</p>

<p style="text-align: right;">Page 114</p> <p>1 WILSON</p> <p>2 Q. So we identified two occasions</p> <p>3 when you looked at your materials, once at</p> <p>4 Boylan Hall and once at Africana studies,</p> <p>5 right?</p> <p>6 A. Once in Boylan Hall and once in</p> <p>7 Africana studies.</p> <p>8 Q. And you also testified that you</p> <p>9 looked at materials at CUNY central?</p> <p>10 A. No, I never testified to that.</p> <p>11 Q. Did Mr. Zwiebach look at</p> <p>12 materials at CUNY Central?</p> <p>13 A. That is my understanding.</p> <p>14 Q. Did you look at any of your</p> <p>15 materials on any other occasions besides</p> <p>16 when you went to Africana studies in 2014</p> <p>17 or 2015 and the time you went to Boylan</p> <p>18 Hall and looked in a conference room in</p> <p>19 2014 or 2015?</p> <p>20 A. I think there were two other</p> <p>21 occasions that I can recall. One was in</p> <p>22 2015. It may have been February of 2015,</p> <p>23 and it was to see if there were additional</p> <p>24 materials for arbitration, as I recall.</p> <p>25 Q. Did you accompany Mr. Zwiebach</p>	<p style="text-align: right;">Page 116</p> <p>1 WILSON</p> <p>2 A. Me personally, no.</p> <p>3 Q. Do you know if Mr. Zwiebach did?</p> <p>4 A. I think Mr. Zwiebach did get</p> <p>5 copies of some administrative files.</p> <p>6 Q. Do you know of any files that</p> <p>7 you and Mr. Zwiebach asked to be copied</p> <p>8 that you didn't -- that he didn't receive?</p> <p>9 A. In terms of administrative</p> <p>10 files, I think he -- he got some copies</p> <p>11 that he asked for.</p> <p>12 MR. JAMES KLEIN: Objection. He</p> <p>13 doesn't know. He can't testify to what</p> <p>14 Mr. Zwiebach got.</p> <p>15 Q. Did you personally receive</p> <p>16 copies of any materials that you reviewed?</p> <p>17 A. Not personally, no.</p> <p>18 Q. So you testified that there were</p> <p>19 two other occasions that you went to</p> <p>20 review materials. Once was at Africana</p> <p>21 studies by yourself, and what was the</p> <p>22 other one?</p> <p>23 A. After my termination, and that</p> <p>24 would have been in March, April, May of</p> <p>25 2016.</p>
<p style="text-align: right;">Page 115</p> <p>1 WILSON</p> <p>2 on that occasion?</p> <p>3 A. No.</p> <p>4 Q. You went by yourself?</p> <p>5 A. He arranged for security to let</p> <p>6 me in; otherwise, I couldn't have gotten</p> <p>7 on campus, and then I was met by security,</p> <p>8 and then there was a security</p> <p>9 representative who sat in front of the</p> <p>10 door, who told me I couldn't take</p> <p>11 anything.</p> <p>12 Q. Where? In front of the door</p> <p>13 where?</p> <p>14 A. This would have been in Africana</p> <p>15 studies. I think it was in -- Africana</p> <p>16 studies on the third floor of James Hall.</p> <p>17 Q. And was this occasion you went</p> <p>18 to Africana studies by yourself before or</p> <p>19 after you went to Africana studies with</p> <p>20 Mr. Zwiebach?</p> <p>21 A. That -- I am not sure if it was</p> <p>22 before or after.</p> <p>23 Q. Did you receive copies of any of</p> <p>24 the materials that you and Mr. Zwiebach</p> <p>25 identified as things you wanted copies of?</p>	<p style="text-align: right;">Page 117</p> <p>1 WILSON</p> <p>2 Q. And what happened then?</p> <p>3 A. What happened then was I looked</p> <p>4 for my letters. I found none. I</p> <p>5 did -- there were books there but not my</p> <p>6 prized collection. I didn't see my</p> <p>7 lecture notes, which would have been</p> <p>8 voluminous. I didn't see my research.</p> <p>9 So that was my most striking recollection</p> <p>10 of 2016.</p> <p>11 Q. Okay. When you went in March,</p> <p>12 April or May of 2016 as you just</p> <p>13 described, did you go with Mr. Zwiebach</p> <p>14 or --</p> <p>15 A. No.</p> <p>16 Q. -- on your own?</p> <p>17 A. On my own. He arranged it, but</p> <p>18 I went on my own.</p> <p>19 Q. Okay. And you didn't see</p> <p>20 your prized collection of books. You</p> <p>21 didn't see your lecture notes or your</p> <p>22 research notes according to what you have</p> <p>23 testified to; is that right?</p> <p>24 A. Or my letters.</p> <p>25 Q. Or your letters. Now, first of</p>

<p style="text-align: right;">Page 118</p> <p>1 WILSON</p> <p>2 all, you referred previously to</p> <p>3 administrative files. What do you mean by</p> <p>4 administrative files?</p> <p>5 A. Well, I was a program</p> <p>6 administrator for several programs, and so</p> <p>7 there are always, you know, voluminous</p> <p>8 administrative files when you have</p> <p>9 hundreds of students, so these would have</p> <p>10 been student records. These would have</p> <p>11 been affirmative action records,</p> <p>12 employment -- employee records because I</p> <p>13 was on numerous search committees</p> <p>14 including presidential search committees.</p> <p>15 So if you are an administrator for many,</p> <p>16 many years, you accumulate many</p> <p>17 administrative files, activities, events</p> <p>18 and so forth.</p> <p>19 Q. Did you consider these</p> <p>20 administrative files to be your personal</p> <p>21 property?</p> <p>22 A. No, not at all.</p> <p>23 Q. Now, on this occasion in March,</p> <p>24 April or May of 2016 when you looked for</p> <p>25 your letters, the prized collection of</p>	<p style="text-align: right;">Page 120</p> <p>1 WILSON</p> <p>2 Q. And what did she tell you?</p> <p>3 A. She said she would assist</p> <p>4 and -- and what she told me initially was</p> <p>5 yes, I knew you didn't have access, and</p> <p>6 that was it.</p> <p>7 Q. Other than speaking with</p> <p>8 Professor Day about whether she saw</p> <p>9 letters, research notes, your prized book</p> <p>10 collection, your lecture notes, did you</p> <p>11 talk to anybody else about where this</p> <p>12 stuff was?</p> <p>13 A. You mean that day?</p> <p>14 Q. At any time, that day or after</p> <p>15 about where this stuff was.</p> <p>16 A. Oh. That is all -- those are</p> <p>17 the only people I can recall at this</p> <p>18 moment.</p> <p>19 Q. Well --</p> <p>20 A. You know --</p> <p>21 Q. You were concerned, were you</p> <p>22 not, that all this prized material wasn't</p> <p>23 there? Yes or no.</p> <p>24 A. Yes, absolutely.</p> <p>25 Q. And did you send an e-mail to</p>
<p style="text-align: right;">Page 119</p> <p>1 WILSON</p> <p>2 your books, your lecture notes, your</p> <p>3 research, and your letters -- I said</p> <p>4 letters twice -- did you say anything to</p> <p>5 anybody as to where this stuff was?</p> <p>6 A. Yes, actually.</p> <p>7 Q. And who did you say something</p> <p>8 to?</p> <p>9 A. At that time, I was met by a</p> <p>10 faculty member who actually gave me access</p> <p>11 to at that time, and that would have been</p> <p>12 Professor Day, and I asked Professor Day</p> <p>13 have you seen my books? Have you seen my</p> <p>14 letters? Have you seen my lectures. I am</p> <p>15 looking for my property, and she said I</p> <p>16 don't know anything about that.</p> <p>17 Q. When was the last time you</p> <p>18 talked with Professor Day?</p> <p>19 A. Probably weeks ago.</p> <p>20 Q. What were the circumstances</p> <p>21 under which you spoke with her a week ago?</p> <p>22 A. I wanted to see if she would be</p> <p>23 willing to be a witness to the seizure of</p> <p>24 my property and to, you know, keep fresh</p> <p>25 in her memory what she witnessed.</p>	<p style="text-align: right;">Page 121</p> <p>1 WILSON</p> <p>2 somebody; did you send a letter to</p> <p>3 somebody; did you complain to anyone about</p> <p>4 this missing material?</p> <p>5 A. I -- I told you previously I</p> <p>6 sent e-mails to Pam Pollack. I</p> <p>7 complained to my attorney, and he filed a</p> <p>8 lawsuit over that, you know. That was</p> <p>9 one of the elements of the lawsuit. So</p> <p>10 those were -- and the -- let's see.</p> <p>11 Those would be the main people who I spoke</p> <p>12 to. That is it.</p> <p>13 Q. So --</p> <p>14 A. Well, I mentioned -- I spoke to</p> <p>15 Hewitt about it, returning my stuff. I</p> <p>16 told you I already spoke to Haugstatter,</p> <p>17 but this was sequential. This was</p> <p>18 evolving. This isn't like -- so if I</p> <p>19 mentioned people earlier that I raised it</p> <p>20 with, that's -- but I won't go back to the</p> <p>21 same people who violated me and ask them.</p> <p>22 You know, obviously if they kept it for</p> <p>23 years what am I going to do, keep hitting</p> <p>24 my head against the wall.</p> <p>25 Q. Well, until you went to Brooklyn</p>

<p style="text-align: right;">Page 122</p> <p>1 WILSON</p> <p>2 College in March, April or May of 2016,</p> <p>3 and you are not sure exactly when it was,</p> <p>4 to get your materials, you didn't know</p> <p>5 exactly what was missing, did you?</p> <p>6 A. Well, that is not exactly</p> <p>7 correct.</p> <p>8 Q. Why is that?</p> <p>9 A. That's because when I was there</p> <p>10 with Mr. Zwiebach, and we had looked in</p> <p>11 boxes, the issue was where is my letters;</p> <p>12 where is my notes; where is my research.</p> <p>13 So I knew that was missing. I didn't</p> <p>14 know what else was missing, but I</p> <p>15 certainly knew major things were missing,</p> <p>16 but no, I didn't have a definitive list at</p> <p>17 that time. And by the way, I still don't</p> <p>18 have a completely definitive list.</p> <p>19 Q. And have you seen any</p> <p>20 communication either from you or your</p> <p>21 counsel to anyone at CUNY or Brooklyn</p> <p>22 College asking about where your research</p> <p>23 notes and your prized book collection and</p> <p>24 your research and letters were?</p> <p>25 A. I believe I saw an e-mail from</p>	<p style="text-align: right;">Page 124</p> <p>1 WILSON</p> <p>2 am not positive. I may have seen</p> <p>3 communication from Mr. Zwiebach asking</p> <p>4 about my materials. Yes.</p> <p>5 Q. And this communication from Mr.</p> <p>6 Zwiebach, when did he send that?</p> <p>7 A. Probably it would been in 2013,</p> <p>8 2014 maybe continuously.</p> <p>9 Q. Let's go to the top of page 4 of</p> <p>10 Exhibit 1.</p> <p>11 A. I am going to have to take a</p> <p>12 break.</p> <p>13 MR. MARK KLEIN: Let's go off</p> <p>14 the record.</p> <p>15 (Luncheon recess: 12:45 p.m.)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 123</p> <p>1 WILSON</p> <p>2 Michael Hewitt. I called him and said</p> <p>3 Michael, I am not getting my mail. I</p> <p>4 haven't been getting my mail for years,</p> <p>5 for months. Where is my mail? And I</p> <p>6 believe there was an e-mail exchange, and</p> <p>7 he said he would try to find out.</p> <p>8 Q. So now we are talking about your</p> <p>9 mail?</p> <p>10 A. Uh-huh.</p> <p>11 Q. I asked you about your research</p> <p>12 notes, your prized book --</p> <p>13 A. But I asked him about my</p> <p>14 property.</p> <p>15 Q. Please. We can't talk at the</p> <p>16 same time.</p> <p>17 A. Okay.</p> <p>18 Q. I asked have you ever seen any</p> <p>19 written communication from you or your</p> <p>20 attorney, any of your attorneys to anyone</p> <p>21 asking where your research notes were,</p> <p>22 where your prized book collection was,</p> <p>23 where your manuscripts were, where your</p> <p>24 letters were, any of that stuff.</p> <p>25 A. I may have seen something, but I</p>	<p style="text-align: right;">Page 125</p> <p>1 WILSON</p> <p>2 AFTERNOON SESSION</p> <p>3 1:30 p.m.</p> <p>4 MR. MARK KLEIN: Back on the</p> <p>5 record.</p> <p>6 DR. JOSEPH WILSON,</p> <p>7 having been previously duly sworn,</p> <p>8 testified further as follows:</p> <p>9 CONTINUED EXAMINATION</p> <p>10 BY MARK KLEIN:</p> <p>11 Q. Dr. Wilson, directing your</p> <p>12 attention to page 4 of Exhibit 1, which is</p> <p>13 plaintiff's initial disclosures in this</p> <p>14 case.</p> <p>15 A. Page 4.</p> <p>16 MR. JAMES KLEIN: I apologize.</p> <p>17 Could we go off the record for one minute.</p> <p>18 I left my copy inside.</p> <p>19 THE WITNESS: I may have taken</p> <p>20 your copy.</p> <p>21 MR. JAMES KLEIN: Okay.</p> <p>22 Q. First off, Dr. Wilson, is there</p> <p>23 any testimony you gave this morning before</p> <p>24 we took a lunch break that you would like</p> <p>25 to change or modify?</p>

32 (Pages 122 - 125)

<p style="text-align: right;">Page 126</p> <p>1 WILSON</p> <p>2 A. I would have to hear what I</p> <p>3 said.</p> <p>4 Q. Sitting here today, is there any</p> <p>5 testimony you gave this morning that you</p> <p>6 would like to change or modify?</p> <p>7 MR. JAMES KLEIN: Well, at a</p> <p>8 later date, we will have an opportunity to</p> <p>9 correct the record.</p> <p>10 MR. MARK KLEIN: Yes, and I am</p> <p>11 asking him now if there is any testimony</p> <p>12 that he would like to change or modify</p> <p>13 that he gave this morning.</p> <p>14 A. At a later date I will review it</p> <p>15 and modify if it if I need to at a later</p> <p>16 date of.</p> <p>17 Q. At this moment you can't think</p> <p>18 of anything?</p> <p>19 A. At this moment, no.</p> <p>20 Q. Directing your attention to</p> <p>21 paragraph 12, there is Barbara Haugstatter</p> <p>22 listed there, correct?</p> <p>23 A. I couldn't hear what you said.</p> <p>24 Q. Number 12 is a listing for</p> <p>25 persons likely to have knowledge of</p>	<p style="text-align: right;">Page 128</p> <p>1 WILSON</p> <p>2 and the storage closet, do you have any</p> <p>3 knowledge that Ms. Haugstatter took any of</p> <p>4 your property?</p> <p>5 A. That she personally took. I</p> <p>6 don't have knowledge of that. No.</p> <p>7 Q. Do you have an understanding of</p> <p>8 what the word conversion means?</p> <p>9 MR. JAMES KLEIN: Well, that</p> <p>10 calls for a legal conclusion.</p> <p>11 A. Yes, I --</p> <p>12 Q. It appears here. Do you have</p> <p>13 an understanding of what the word</p> <p>14 conversion means?</p> <p>15 A. My understanding is that that's</p> <p>16 like when somebody takes something or</p> <p>17 keeps something from you that is not</p> <p>18 theirs, and, yes, so I understand it in</p> <p>19 this context. I am not sure if that is</p> <p>20 legal, but that is what I understand.</p> <p>21 Q. Do you have any knowledge that</p> <p>22 Ms. Haugstatter took any of your property</p> <p>23 and kept it?</p> <p>24 A. I have knowledge that she had</p> <p>25 control over my property and didn't -- for</p>
<p style="text-align: right;">Page 127</p> <p>1 WILSON</p> <p>2 discoverable facts, and the person that is</p> <p>3 listed is Barbara Haugstatter, correct?</p> <p>4 A. That's correct.</p> <p>5 Q. And it says next to her name</p> <p>6 "Brooklyn College employee participated in</p> <p>7 search and seizure and conversion." Do</p> <p>8 you see that there, sir?</p> <p>9 A. I see that.</p> <p>10 Q. What search and seizure did</p> <p>11 Barbara Haugstatter participate in?</p> <p>12 A. The -- all of my office</p> <p>13 materials, my property that was seized at</p> <p>14 25 Broadway Barbara had access to, and she</p> <p>15 also had access to the seized property at</p> <p>16 Brooklyn College.</p> <p>17 Q. And you say that Barbara had</p> <p>18 access to your materials because they were</p> <p>19 in a storage closet; is that right?</p> <p>20 A. I said that she -- I would say</p> <p>21 she had access because she had access to</p> <p>22 my offices, and that is why. In addition</p> <p>23 to the storage locker.</p> <p>24 Q. Besides the fact that</p> <p>25 Ms. Haugstatter had access to your offices</p>	<p style="text-align: right;">Page 129</p> <p>1 WILSON</p> <p>2 whatever reason didn't allow me access to</p> <p>3 it, yes.</p> <p>4 Q. Do you have any knowledge that</p> <p>5 Ms. Haugstatter took your property and</p> <p>6 hasn't returned it?</p> <p>7 A. Well, Ms. Haugstatter told me</p> <p>8 that they had my property. She told me</p> <p>9 we have your stuff. We have your plant.</p> <p>10 We have your easel, and she would speak to</p> <p>11 Paisley about my stuff. So that is my</p> <p>12 knowledge of what she knows.</p> <p>13 Q. Do you know if Ms. Haugstatter</p> <p>14 had access to your office at 25 Broadway</p> <p>15 after the locks were changed?</p> <p>16 A. That's my understanding.</p> <p>17 Q. And what is the basis of your</p> <p>18 understanding?</p> <p>19 A. Because staff who worked there</p> <p>20 for a period of time told me that Barbara</p> <p>21 Haugstatter was situated at 25 Broadway</p> <p>22 for a period of time in a secretarial</p> <p>23 capacity.</p> <p>24 Q. And when was she situated at 25</p> <p>25 Broadway?</p>

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1 WILSON
2 A. I don't know exactly when.
3 Q. All right. The next person
4 listed is Karen Gould, and you are
5 referring to Brooklyn College's former
6 president, correct?
7 A. Correct.
8 Q. And it says with respect to
9 Karen Gould that she "participated in
10 search and seizure" -- let me try that
11 again. I am sorry. That she
12 "participated in search and seizure and
13 conversion." Do you see that?
14 A. I see that.
15 Q. And how did President Gould
16 participate in this search and seizure to
17 your knowledge?
18 MR. JAMES KLEIN: Again, I am
19 going to object. It calls for a legal
20 conclusion.
21 Q. What is the basis for that
22 statement there, sir?
23 A. That she ordered her employees
24 to change locks on my offices and to
25 restrict -- and forbid my access to my

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1 WILSON
2 property that was under her administrative
3 control.
4 Q. And you've already told us what
5 your understanding of the word conversion
6 is. Are you aware of any facts that
7 President Gould took and failed to return
8 of your property?
9 A. The fact that my property was
10 under her control, that's the main fact.
11 Q. All right. Now, it also says
12 below in the line below her name that she
13 "participated in defamation with Cheng."
14 Do you see that?
15 A. Yes.
16 Q. What defamation are you
17 referring to?
18 MR. JAMES KLEIN: Again, I am
19 going to object. It calls for a legal
20 conclusion.
21 MR. MARK KLEIN: Your objection
22 is noted.
23 Q. What defamation are you
24 referring to?
25 A. Gould told numerous people that

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1 WILSON
2 I was a thief, that I was stealing money.
3 Q. And what defamation with Cheng
4 is referred to there?
5 MR. JAMES KLEIN: Any time you
6 refer to a legal term like defamation I
7 have an objection that you are calling for
8 a legal conclusion.
9 MR. MARK KLEIN: This is
10 plaintiff's initial disclosures.
11 MR. JAMES KLEIN: I understand,
12 but I am making a record of it.
13 MR. MARK KLEIN: Fine.
14 Q. What defamation is referred to
15 there?
16 A. So Gould and her staff including
17 Cheng went around telling people I was a
18 thief.
19 Q. Are you aware of any defamatory
20 statement made by Mr. Cheng himself?
21 A. Yes.
22 Q. What statement?
23 A. My understanding is that he told
24 Ivy Rich that I was a thief.
25 Q. And who is Ivy Rich?

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1 WILSON
2 A. Ivy Rich was at that time the
3 leader or director or some position in the
4 labor arts program.
5 Q. And the labor arts program was
6 situated on the 17th -- sorry, on the 7th
7 floor of 25 Broadway?
8 A. When?
9 Q. At any time.
10 A. At that time, no. At this
11 time, yes.
12 Q. That time being when?
13 A. In 2011, early -- in 2012 they
14 were not situated.
15 Q. All right. So Ivy Rich told
16 you that Mr. Cheng said you were a
17 "thief"; is that right?
18 A. No, that's not right.
19 Q. Ivy Rich told somebody that Mr.
20 Cheng said you were a thief?
21 A. Correct.
22 Q. Who did Ivy Rich tell that Mr.
23 Cheng said that?
24 A. She told Steve Leberstein.
25 Q. And Mr. Leberstein told you that

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1 WILSON
2 Ivy Rich told him that Terrence Cheng said
3 you were a thief?
4 A. Exactly.
5 Q. And when did Ivy Rich tell Steve
6 Leberstein that?
7 A. That would have been in early
8 2012.
9 Q. And when did Mr. Leberstein tell
10 you that Ivy Rich had told him that
11 Terrence Cheng said you were a thief?
12 A. Contemporaneously, like the same
13 day that it happened.
14 Q. Early 2012?
15 A. Early 2012.
16 Q. Did Mr. Leberstein tell you at
17 any other time that Terrence Cheng had
18 said in front of Ivy Rich that you were a
19 thief?
20 A. Yes, later in 2012 he told me,
21 and again in 2013 he told me.
22 Q. Now, he told you in 2012 and
23 2013 that Terrence Cheng had said to Ivy
24 Rich in early 2012 that you were a thief?
25 A. He told me in 2012 when it

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1 WILSON
2 happened and then repeated it
3 subsequently.
4 Q. So it only happened once in
5 early 2012?
6 A. I don't know how many times it
7 happened, but he told me that -- that one
8 occasion, but it was a process. Anyhow.
9 Q. I am asking you, sir, to your
10 knowledge and based on what people --
11 MR. MARK KLEIN: Withdrawn.
12 Q. Were you ever present when
13 Terrence Cheng said you were a thief?
14 A. No.
15 Q. Were you ever present when
16 Terrence Cheng made any defamatory
17 statement about you?
18 A. No.
19 Q. Are you aware of --
20 MR. MARK KLEIN: Withdrawn.
21 Q. You have testified that Steve
22 Leberstein told you in early 2012 that Ivy
23 Rich had said that Terrence Cheng had said
24 that you were a thief, right?
25 A. Correct.

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1 WILSON
2 Q. So based on what Steve
3 Leberstein told you, you were aware of one
4 instance in which Terrence Cheng said you
5 were a thief, right?
6 A. Based on Steve Leberstein, yes.
7 Are you aware of any other instance in
8 which Mr. Cheng allegedly said anything
9 defamatory about you?
10 A. Yes.
11 MR. JAMES KLEIN: Again, I am
12 going -- it calls for a legal conclusion.
13 MR. MARK KLEIN: Your objection
14 is noted.
15 Q. You know what defamation is,
16 right, sir?
17 MR. JAMES KLEIN: I object.
18 It calls for a legal conclusion. You
19 can't ask him what defamation is.
20 Q. What is your understanding of
21 what defamation is?
22 MR. JAMES KLEIN: That calls for
23 a legal conclusion.
24 MR. MARK KLEIN: I am asking for
25 his understanding, Mr. Klein.

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1 WILSON
2 A. When they lie about you in a way
3 that is harmful.
4 Q. So that is your understanding of
5 defamation, right?
6 A. Yes.
7 Q. Now, other than this instance
8 that you described where Steve Leberstein
9 told you in early 2012 that Ivy Rich had
10 told him that Mr. Cheng had said you were
11 a thief, are you aware of any other
12 instances or anything -- where anybody
13 lied and said something bad about you by
14 Mr. Cheng?
15 A. Yes.
16 Q. When?
17 A. Also in 2012.
18 Q. So another time in 2012?
19 A. Yes, there were, for example --
20 well, yes. Yes.
21 Q. Okay. How many times in 2012
22 did Mr. Cheng make a defamatory statement
23 about you?
24 A. I don't know the total number.
25 Q. Other than in 2012, are you

<p style="text-align: right;">Page 138</p> <p>1 WILSON</p> <p>2 aware of any other instances in which Mr.</p> <p>3 Cheng made a defamatory statement about</p> <p>4 you?</p> <p>5 A. Yes.</p> <p>6 Q. When?</p> <p>7 A. In 2012. You mean what</p> <p>8 instance?</p> <p>9 Q. Other than in 2012 --</p> <p>10 A. Beyond 2012.</p> <p>11 Q. Right. Are you aware of</p> <p>12 any -- let me ask the question again just</p> <p>13 so we are clear.</p> <p>14 Other than in 2012 at any time</p> <p>15 in 2012 are you aware of any instances in</p> <p>16 which Mr. Cheng allegedly made a</p> <p>17 defamatory statement about you?</p> <p>18 A. No.</p> <p>19 Q. Now, the next paragraph is</p> <p>20 number 14 referring to Terrence Cheng,</p> <p>21 correct?</p> <p>22 A. Yes.</p> <p>23 Q. And it says here "Participated</p> <p>24 in search and seizure and conversion</p> <p>25 defamation, malice." Do you see that?</p>	<p style="text-align: right;">Page 140</p> <p>1 WILSON</p> <p>2 Q. Do you know if he authorized the</p> <p>3 search and seizure of your office?</p> <p>4 A. I don't know.</p> <p>5 MR. JAMES KLEIN: I believe</p> <p>6 that calls for a legal conclusion.</p> <p>7 Q. Now, you also say he</p> <p>8 participated in the conversion -- in</p> <p>9 conversion, correct?</p> <p>10 A. Correct.</p> <p>11 Q. Are you aware of any property</p> <p>12 that Mr. Cheng took of yours and didn't</p> <p>13 return?</p> <p>14 A. I am aware that all of my</p> <p>15 property at 25 Broadway was seized while</p> <p>16 it was under his administrative control.</p> <p>17 Q. Are you aware of any property</p> <p>18 that he personally took and didn't return?</p> <p>19 A. Not specifically.</p> <p>20 Q. Now, then it says defamation.</p> <p>21 We have already -- I have already asked</p> <p>22 you about that, and you've told me that</p> <p>23 the only defamation that you are aware of</p> <p>24 took place in the year 2012; is that</p> <p>25 right, sir?</p>
<p style="text-align: right;">Page 139</p> <p>1 WILSON</p> <p>2 A. Yes.</p> <p>3 Q. Do you have any -- are you aware</p> <p>4 of any facts supporting an allegation that</p> <p>5 Mr. Cheng participated in any search and</p> <p>6 seizure of your property?</p> <p>7 A. Yes.</p> <p>8 Q. What is the basis of your</p> <p>9 knowledge?</p> <p>10 A. That Terrence Cheng had</p> <p>11 administrative control over my offices at</p> <p>12 25 Broadway.</p> <p>13 Q. What is the basis of that</p> <p>14 statement?</p> <p>15 A. Because that was his position in</p> <p>16 the college and because he frequented the</p> <p>17 Center For Worker Education after I was</p> <p>18 removed as director.</p> <p>19 Q. So when you say here in</p> <p>20 paragraph 14 on page 4 of Exhibit 1 that</p> <p>21 Mr. Cheng "Participated in search and</p> <p>22 seizure", is that based on the fact that</p> <p>23 he had control over the Graduate Center</p> <p>24 For Worker Education according to you?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 141</p> <p>1 WILSON</p> <p>2 A. That's right.</p> <p>3 Q. Number 17 is Professor Linda</p> <p>4 Day. We have talked a little bit about</p> <p>5 her, right?</p> <p>6 A. Right.</p> <p>7 Q. At the time was she chairperson</p> <p>8 of the department of Africana studies at</p> <p>9 Brooklyn College?</p> <p>10 A. At what time?</p> <p>11 Q. At any time from 2012 to the</p> <p>12 present.</p> <p>13 A. Yes.</p> <p>14 Q. When was she chairperson?</p> <p>15 A. I don't know the exact dates.</p> <p>16 Q. Now, it says with regard to</p> <p>17 Professor Day, "Witnessed ongoing seizure</p> <p>18 of plaintiff's property on main campus,</p> <p>19 seizure, storage at Africana studies." Do</p> <p>20 you see that?</p> <p>21 A. I see that.</p> <p>22 Q. To the best of your knowledge,</p> <p>23 what seizure of your property on the main</p> <p>24 campus did Professor Day witness?</p> <p>25 MR. JAMES KLEIN: Again, it</p>

36 (Pages 138 - 141)

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1 WILSON
2 calls for a legal conclusion.
3 Q. You can answer.
4 A. My property was seized and
5 stored in Africana studies, and so
6 she -- because I was banned from campus I
7 had no access to my property. She knew
8 that, and she -- so that was the seizure
9 that she witnessed.
10 Q. Number 18 is Professor George
11 Cunningham, correct?
12 A. Correct.
13 Q. In what department was Professor
14 Cunningham a professor?
15 A. Africana studies.
16 Q. When was the last time you spoke
17 with Professor Cunningham?
18 A. Maybe a couple of weeks ago.
19 Q. Did you talk to him about being
20 a witness in your case?
21 A. Yes, I did.
22 Q. And what did he tell you and
23 what did you tell him about any of the
24 events relating to this case?
25 A. Essentially I said I might want

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1 WILSON
2 him as a witness to the seizure of my
3 property, and he agreed.
4 Q. And do you know what seizure of
5 your property he witnessed?
6 MR. JAMES KLEIN: Again, it
7 calls for a legal conclusion.
8 Q. You can answer.
9 A. He witnessed that my property
10 was in Africana studies.
11 Q. Did he have any role in getting
12 your property into Africana studies?
13 A. To my knowledge, he allowed
14 property -- the college wanted to move the
15 property, and he allowed the property to
16 be taken to Africana studies.
17 Q. Did you ever tell anyone at
18 Brooklyn College you wanted your property
19 moved to Africana studies?
20 A. I don't recall that.
21 Q. Now, it also says with regard to
22 Professor Cunningham that he was a witness
23 to defamation, correct?
24 A. Yes.
25 Q. Do you know if he was a witness

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1 WILSON
2 to any defamation by Terrence Cheng?
3 A. I don't know.
4 Q. Number 20 is Steve Leberstein,
5 correct?
6 A. Correct.
7 Q. At the bottom of page 4?
8 A. That's correct.
9 Q. Now, you testified that Mr.
10 Leberstein told you what Ivy Rich had told
11 him about what Terrence Cheng supposedly
12 had said about you, right?
13 A. That's correct.
14 Q. And that was in early 2012,
15 right?
16 A. Correct.
17 Q. Are you aware of any other
18 "defamation" that he witnessed?
19 A. At that time in 2012, he
20 mentioned that he had a meeting or several
21 meetings with Terrence Cheng.
22 Q. And that was in 2012?
23 A. 2012 I believe maybe. Possibly
24 2013.
25 Q. What did he tell you Mr. Cheng

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1 WILSON
2 said during these meetings in 2012 and
3 2013?
4 A. After one of the meetings, he
5 called me to describe the meeting that he
6 had with Terrence Cheng.
7 Q. And what did he tell you Mr.
8 Cheng had said, if anything?
9 A. What he said was that Terrence
10 Cheng basically said he was coming in to
11 clean up the criminal stuff at the
12 Graduate Center For Worker Education.
13 Q. That is what Mr. Leberstein told
14 you?
15 A. That is what he told me at that
16 time, yes.
17 Q. And what Mr. Leberstein told you
18 was about meetings that took place in 2012
19 or 2013, right?
20 A. Right.
21 Q. Did Mr. Leberstein ever tell you
22 about any meetings that took place after
23 2013?
24 A. No.
25 Q. Okay. If you go to the top of

<p style="text-align: right;">Page 146</p> <p>1 WILSON</p> <p>2 page 5, Number 21, Professor Robert</p> <p>3 Cherry.</p> <p>4 A. Yes.</p> <p>5 Q. And you list him as a defamation</p> <p>6 witness, correct?</p> <p>7 A. Correct.</p> <p>8 Q. And then it says "President</p> <p>9 Gould's husband told him that Gould had no</p> <p>10 evidence of plaintiff's criminal acts but</p> <p>11 would go after plaintiff on "Technical</p> <p>12 ground rules."</p> <p>13 A. That's correct.</p> <p>14 Q. Is that the -- is that the</p> <p>15 defamatory statement to which Professor</p> <p>16 Cherry was a witness?</p> <p>17 MR. JAMES KLEIN: Calls for a</p> <p>18 legal conclusion.</p> <p>19 MR. MARK KLEIN: Again, you</p> <p>20 interrupted my question. If you can</p> <p>21 wait, then you can make your silly</p> <p>22 objection.</p> <p>23 Q. Is that the alleged defamatory</p> <p>24 statement to which Professor cherry is a</p> <p>25 witness?</p>	<p style="text-align: right;">Page 148</p> <p>1 WILSON</p> <p>2 details. Well, I am not totally sure,</p> <p>3 but I think he told Immanuel Ness, another</p> <p>4 professor, that Gould told him that</p> <p>5 basically you shouldn't associate with</p> <p>6 criminals, and, you know, I was a</p> <p>7 criminal, and then there was also by</p> <p>8 implication that Ness -- I don't remember</p> <p>9 all the details, but that was -- yes, that</p> <p>10 was the sort of -- what I remember.</p> <p>11 Q. And to the best of your</p> <p>12 knowledge, when President Gould's husband</p> <p>13 tell Professor Cherry this?</p> <p>14 A. To the best of my knowledge that</p> <p>15 would have been in 2012.</p> <p>16 Q. Number 22 is Professor Immanuel</p> <p>17 Ness, correct?</p> <p>18 A. Yes.</p> <p>19 Q. And according to this "he</p> <p>20 witnessed defamation". Did you see that?</p> <p>21 A. Yes.</p> <p>22 Q. Do you know when Professor Ness</p> <p>23 witnessed defamation?</p> <p>24 A. In 2011 and 2012.</p> <p>25 Q. Do you see number 23 Max Azoula?</p>
<p style="text-align: right;">Page 147</p> <p>1 WILSON</p> <p>2 MR. JAMES KLEIN: Are you done</p> <p>3 with your question now?</p> <p>4 MR. MARK KLEIN: Yes.</p> <p>5 MR. JAMES KLEIN: It calls for</p> <p>6 a legal conclusion.</p> <p>7 MR. MARK KLEIN: Thank you.</p> <p>8 Q. You can answer.</p> <p>9 A. That is what he told me.</p> <p>10 Q. Are you aware of any other</p> <p>11 defamatory statements to which Professor</p> <p>12 Cherry was a witness?</p> <p>13 MR. JAMES KLEIN: Are you done</p> <p>14 with your question now? It calls for a</p> <p>15 legal conclusion.</p> <p>16 MR. MARK KLEIN: Do you want me</p> <p>17 to get the judge on the phone?</p> <p>18 MR. JAMES KLEIN: Two people can</p> <p>19 be unprofessional.</p> <p>20 Q. Are you aware of any other</p> <p>21 defamatory statements to which Professor</p> <p>22 Cherry was a witness?</p> <p>23 A. Yes.</p> <p>24 Q. What?</p> <p>25 A. I am trying to recall the</p>	<p style="text-align: right;">Page 149</p> <p>1 WILSON</p> <p>2 A. Yes.</p> <p>3 Q. And according to the list here</p> <p>4 he was "told by Cheng's staff, Phillips,</p> <p>5 "Wilson was a thief." Do you see that?</p> <p>6 A. Yes, I see that.</p> <p>7 Q. Who is Cheng's staff?</p> <p>8 A. Phillips.</p> <p>9 Q. So you are saying Dean Phillips</p> <p>10 was on Terrence Cheng's staff?</p> <p>11 A. Dean Phillips reported to</p> <p>12 Terrence Cheng, yes.</p> <p>13 Q. Okay. To your knowledge did</p> <p>14 Mr. Azoula --</p> <p>15 MR. MARK KLEIN: Withdrawn.</p> <p>16 Q. To your knowledge, did Terrence</p> <p>17 Cheng tell Max Azoula that you were a</p> <p>18 thief?</p> <p>19 A. I don't know.</p> <p>20 Q. Number 24 refers to Jose Ohyan,</p> <p>21 O-H-Y-A-N. Do you see that?</p> <p>22 A. I see that.</p> <p>23 Q. And it also says, "Told by</p> <p>24 Cheng's staff, Phillips, Wilson was</p> <p>25 stealing." Do you see that?</p>

38 (Pages 146 - 149)

<p style="text-align: right;">Page 150</p> <p>1 WILSON</p> <p>2 A. I see that.</p> <p>3 Q. To your knowledge, did Terrence</p> <p>4 Cheng tell Mr. Ohyan directly that you</p> <p>5 were stealing?</p> <p>6 A. I don't know.</p> <p>7 Q. Number 25 is an entry for</p> <p>8 Professor Emeritus Nancy Romer, correct?</p> <p>9 A. Correct.</p> <p>10 Q. And in the entry with respect to</p> <p>11 her it refers to "Cheng's team admin."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Now, do you know who is referred</p> <p>15 to there?</p> <p>16 A. No, not specifically.</p> <p>17 Q. Do you know what a team's admin</p> <p>18 is?</p> <p>19 A. People who work with an</p> <p>20 administrator.</p> <p>21 Q. Okay. To your knowledge, was</p> <p>22 Nancy Romer told by Mr. Cheng directly any</p> <p>23 defamatory allegation regarding you?</p> <p>24 A. I don't know.</p> <p>25 Q. Number 26 refers to Jumaane</p>	<p style="text-align: right;">Page 152</p> <p>1 WILSON</p> <p>2 A. Ms. Gaskins is a former student</p> <p>3 at the graduate center.</p> <p>4 Q. And she is now in Atlanta,</p> <p>5 Georgia?</p> <p>6 A. Correct.</p> <p>7 Q. When was the last time you spoke</p> <p>8 with her?</p> <p>9 A. A couple of weeks ago.</p> <p>10 Q. Did you ask her if she would be</p> <p>11 a witness for you?</p> <p>12 A. Yes, I did.</p> <p>13 Q. Now, did you talk with her about</p> <p>14 what she was going to testify about?</p> <p>15 A. I asked her if she remembered</p> <p>16 defamatory statements she made</p> <p>17 about -- yes, Cheng.</p> <p>18 Q. You asked her whether she</p> <p>19 remembered Terrence Cheng making</p> <p>20 defamatory statements; is that right?</p> <p>21 A. About me.</p> <p>22 Q. And what did she say?</p> <p>23 A. She would have to think about</p> <p>24 it.</p> <p>25 Q. It says here "Witnessed Cheng's</p>
<p style="text-align: right;">Page 151</p> <p>1 WILSON</p> <p>2 Williams, correct?</p> <p>3 A. Correct.</p> <p>4 Q. Do you know whether Mr. Williams</p> <p>5 was told by Terrence Cheng that you were a</p> <p>6 thief?</p> <p>7 A. I don't know.</p> <p>8 Q. In the second line it says, "Was</p> <p>9 told by NY Times defamation in advance."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. What do you mean by that?</p> <p>13 A. Council Member Williams told me</p> <p>14 in advance of the appearance of the New</p> <p>15 York Times article that Gould told him</p> <p>16 that an article was going to come out</p> <p>17 about me.</p> <p>18 Q. In the New York Times?</p> <p>19 A. He didn't say specifically, but</p> <p>20 he said there is going to be an article, a</p> <p>21 big article coming out about me.</p> <p>22 Q. Okay. Number 27 is an entry</p> <p>23 for Erica Gaskins, correct?</p> <p>24 A. Correct.</p> <p>25 Q. And who is Ms. Gaskins?</p>	<p style="text-align: right;">Page 153</p> <p>1 WILSON</p> <p>2 defamatory statements," right?</p> <p>3 A. Well, I will clarify. At that</p> <p>4 time in 2012 I spoke to her, and she told</p> <p>5 me that she was in several meetings with</p> <p>6 Terrence Cheng, and at that time in 2012</p> <p>7 she told me that Terrence Cheng</p> <p>8 criminalized the program, criminalized the</p> <p>9 students, and criminalized the leadership</p> <p>10 of the program, and so at that time she</p> <p>11 told me she felt like she was a criminal</p> <p>12 and that everybody associated with the</p> <p>13 program was a criminal. That is what she</p> <p>14 told me at that time, but this was years</p> <p>15 back.</p> <p>16 Q. And that was in 2012?</p> <p>17 A. 2012.</p> <p>18 Q. When did --</p> <p>19 MR. MARK KLEIN: Withdrawn.</p> <p>20 Q. How long was Ms. Gaskins a</p> <p>21 student at the graduate center?</p> <p>22 A. I don't know.</p> <p>23 Q. Do you know when she stopped</p> <p>24 being a student?</p> <p>25 A. I don't know.</p>

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1 WILSON
2 Q. But whatever information you
3 have about what she observed or saw
4 relates to 2012, right?
5 A. That is right.
6 Q. If you go to the next page, page
7 6, number 31 the entry for Penny Lewis,
8 and it says "with regard to her repeated
9 defamation." Do you see that?
10 A. Yes.
11 Q. What defamation are you
12 referring to?
13 A. Specifically that I was a thief.
14 Q. And when did she "repeat this
15 defamation"?
16 A. That would have been in about
17 2013.
18 Q. And why do you believe it was in
19 2013?
20 A. Because I remember it was
21 sometime after this whole thing started,
22 so it wasn't in 2012, but it would have
23 been in 2013 or '14. It would have been
24 even later.
25 Q. So you are saying that Penny

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1 WILSON
2 Lewis repeated somebody else's defamatory
3 statement?
4 A. Yes.
5 Q. And do you know whose defamatory
6 statement she repeated?
7 A. I don't know where she got her
8 information.
9 Q. Okay. I direct your attention
10 to paragraph 33, Professor Haroon Kareeam.
11 Did I pronounce his name right?
12 A. Kareeam.
13 Q. Kareeam. Thank you. That's
14 K-A-R-E-E-A-M. That is how you spell it?
15 A. I believe so.
16 Q. Now, according to this entry it
17 says he "witnessed defamatory statements".
18 Do you see that?
19 A. I see that.
20 Q. What defamatory statements are
21 you referring to?
22 A. In 2012 after he had been
23 interviewed, and I am not sure by who, he
24 told me that he was told that for him to
25 come, you know, to confess -- to speak up

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1 WILSON
2 about my criminal behavior, my criminal --
3 my stealing and things of that sort.
4 Q. And who interviewed him?
5 A. I don't know.
6 Q. Have you spoken to -- when was
7 the last time you spoke to Mr. Kareeam?
8 A. Maybe in -- maybe in 2014.
9 Q. I direct your attention to --
10 did Professor Kareeam use the word
11 criminal?
12 A. Yes, stealing and criminal.
13 Yes.
14 Q. And did he tell you who had used
15 those words, if anyone?
16 A. He said the people who
17 interviewed him.
18 Q. And he didn't tell you who
19 interviewed him?
20 A. No, he may have, but I don't
21 recall.
22 Q. And this was in 2013, right?
23 A. Well, the view was I think in
24 2012, but -- 2012, 2013. I don't
25 remember precisely.

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1 WILSON
2 Q. Okay. Directing your attention
3 to the top of page 7. Page 7.
4 A. Yes.
5 Q. You have an entry 41 for Steve
6 Brier, B-R-I-E-R.
7 A. Yes.
8 Q. With regard to him it says,
9 "Witnessed attempted intimidation by Cheng
10 team, Phillips," right?
11 A. Yes.
12 Q. When was the last time you spoke
13 with Mr. Brier?
14 A. Maybe 2016.
15 Q. Who is the Cheng team that is
16 referred to here?
17 A. Phillips.
18 Q. Okay. Have you talked to Mr.
19 Brier about being a witness in this case?
20 A. No.
21 Q. The next entry is for Funke
22 Okome. Did I pronounce his name right?
23 A. Her name. Okome.
24 Q. F-U-N-K-E capital O-K-E-M-E,
25 right?

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1 WILSON
2 A. Right.
3 Q. When is the last time you spoke
4 with Professor Okome?
5 A. Maybe in 2013
6 or -- approximately.
7 Q. All right.
8 A. 2014 maybe.
9 Q. It says here "Aware of hostile
10 acts around false plagiarism charges,
11 defamation cause, loss of collaboration
12 and research publishing consulting causing
13 economic damage." Do you see that?
14 A. I see that.
15 Q. And what defamation is referred
16 to there, if any?
17 A. So Professor Wilson told me that
18 Currah --
19 Q. You're professor Wilson.
20 A. I'm sorry. Professor Okome
21 told me. I might have to have a break in
22 a minute.
23 Professor Okome told me that
24 Currah and Robin stated that Professor
25 Wilson or me was guilty of plagiarism and

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1 WILSON
2 would have been accused of plagiarism, and
3 that -- I didn't get the details, but that
4 she was asked by Currah and Robin I
5 believe to be on a plagiarism review
6 committee of my students' papers that had
7 been seized. And so that was -- that was
8 the issue of plagiarism where she
9 was -- either she was on the committee or
10 she told me that a committee, ad hoc
11 committee had been formed to review my
12 students' work that had been seized from
13 my office.
14 Q. And when did Professor Okome
15 tell you that?
16 A. At the time that this happened.
17 Q. When was that?
18 A. That would have been in 2012,
19 early 2012, and I am just trying to think
20 if it -- it may have also started in 2011.
21 Actually upon reflection I think -- I
22 think it started in the fall of 2011 and
23 carried over.
24 Q. All right. I direct your
25 attention to paragraph 44, David Addams,

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1 WILSON
2 Esq. foundation director.
3 A. Yes.
4 Q. Do you see that?
5 A. Yes.
6 Q. Is Mr. Addams one of your
7 experts in this case now?
8 A. Mr. Addams is an expert.
9 Q. He is one of your experts in
10 this case?
11 A. He is one of my experts in this
12 case.
13 Q. Okay. It says under his name
14 "Found plaintiff unemployable." Do you see
15 that?
16 A. Correct.
17 Q. When did Mr. Addams find you
18 unemployable?
19 A. This was after the appearance of
20 the New York Times article. I believe
21 that was in 2012 or 2013.
22 Q. So after the New York Times
23 article came out, Mr. Addams told you that
24 you were unemployable?
25 A. That it would be difficult to

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1 WILSON
2 employ me. Correct.
3 Q. Did you ask him for a job?
4 A. I said if there are any
5 positions available I am -- I am
6 available. Yes.
7 Q. Any positions in what?
8 A. In the organization that he
9 was -- he was working at a foundation I
10 believe at that time.
11 Q. What foundation was that?
12 A. I don't recall the name.
13 Q. Is he still with that
14 foundation?
15 A. I don't know if it is the same
16 foundation, but he is at a foundation.
17 Q. So at the time of the New York
18 Times article --
19 MR. MARK KLEIN: Withdrawn.
20 Q. Had you spoken about employment
21 with Mr. Addams before or after the New
22 York Times article?
23 A. Not before.
24 Q. You spoke to him afterwards?
25 A. Well, I -- no, I spoke to him

<p style="text-align: right;">Page 162</p> <p>1 WILSON</p> <p>2 about other opportunities probably</p> <p>3 starting in maybe right even around the</p> <p>4 same time, right around the time --</p> <p>5 Q. The time of the New York Times</p> <p>6 article?</p> <p>7 A. Yes.</p> <p>8 Q. And to the best of your</p> <p>9 recollection, when was the -- when did the</p> <p>10 New York times article come out?</p> <p>11 A. Maybe 2013. I'm not sure of</p> <p>12 the exact date.</p> <p>13 MR. MARK KLEIN: I ask that the</p> <p>14 reporter mark as Wilson 3 a reprint of an</p> <p>15 article from the New York Times.</p> <p>16 (Wilson Exhibit 3 marked for</p> <p>17 identification.)</p> <p>18 (Document handed to witness.)</p> <p>19 Q. Dr. Wilson, I show you what has</p> <p>20 been marked as Wilson Exhibit 3. Please</p> <p>21 take a moment to generally review it and</p> <p>22 tell me when you have done so.</p> <p>23 A. Okay.</p> <p>24 Q. Is this the article you were</p> <p>25 referring to, sir?</p>	<p style="text-align: right;">Page 164</p> <p>1 WILSON</p> <p>2 A. And beyond. I mean this is --</p> <p>3 this was from 2018 it says on the top</p> <p>4 here. It doesn't say it is from 2014.</p> <p>5 Q. No, 2018 is when I printed it.</p> <p>6 A. Right. From where?</p> <p>7 Q. Online.</p> <p>8 A. Right. So what I am telling you</p> <p>9 is online is not necessarily the same as</p> <p>10 what occurred in print that day.</p> <p>11 Q. Okay. When did you first speak</p> <p>12 with Mr. Addams about employment</p> <p>13 opportunities?</p> <p>14 A. Right around the time of this</p> <p>15 article coming out.</p> <p>16 Q. And when was the last time you</p> <p>17 spoke to Mr. Addams regarding employment</p> <p>18 opportunities?</p> <p>19 A. Maybe a few months ago.</p> <p>20 Q. And what did you say to Mr.</p> <p>21 Addams about employment opportunities a</p> <p>22 few months ago?</p> <p>23 A. I said I was still interested in</p> <p>24 employment opportunities, and Mr. Addams</p> <p>25 said, you know, because of the articles</p>
<p style="text-align: right;">Page 163</p> <p>1 WILSON</p> <p>2 A. It may or may not be. I'm not</p> <p>3 sure.</p> <p>4 Q. So you think there might have</p> <p>5 been more than one New York Times article?</p> <p>6 A. Yes.</p> <p>7 Q. According to this exhibit, this</p> <p>8 article is published on January 12, 2014;</p> <p>9 is that right?</p> <p>10 A. That is according to this,</p> <p>11 correct, January 14.</p> <p>12 Q. And you're not sure if this is</p> <p>13 the article that Jumaane Williams had told</p> <p>14 you was going to be coming out; is that</p> <p>15 right?</p> <p>16 A. New York Times published</p> <p>17 different versions of their article, so I</p> <p>18 don't know if this is the original</p> <p>19 version.</p> <p>20 Q. Do you think there might have</p> <p>21 been an article in the New York Times that</p> <p>22 you have in mind that came out in 2013?</p> <p>23 A. I think there may have been</p> <p>24 versions of this article.</p> <p>25 Q. In 2013?</p>	<p style="text-align: right;">Page 165</p> <p>1 WILSON</p> <p>2 and so forth that it would be difficult</p> <p>3 for me to get a job.</p> <p>4 Q. Does Mr. Addams know that you</p> <p>5 were terminated by CUNY?</p> <p>6 MR. JAMES KLEIN: It calls for</p> <p>7 speculation. He can't testify --</p> <p>8 Q. To your knowledge, do you know</p> <p>9 if Mr. Addams knows that you were</p> <p>10 terminated by CUNY?</p> <p>11 A. To my knowledge, he knows he was</p> <p>12 terminated by CUNY.</p> <p>13 Q. And to your knowledge, does Mr.</p> <p>14 Addams know that a neutral arbitrator</p> <p>15 upheld your termination?</p> <p>16 A. I don't know about that.</p> <p>17 Q. You haven't told him; is that</p> <p>18 right?</p> <p>19 A. I didn't mention that, no.</p> <p>20 Q. Number 45, could you pronounce</p> <p>21 the name of that person for me?</p> <p>22 A. Page 45.</p> <p>23 Q. No, I'm sorry. Going back to</p> <p>24 Exhibit 1.</p> <p>25 MR. JAMES KLEIN: Paragraph 45.</p>

42 (Pages 162 - 165)

<p style="text-align: right;">Page 166</p> <p>1 WILSON</p> <p>2 Q. Paragraph 45.</p> <p>3 A. Number 45.</p> <p>4 Q. Yes.</p> <p>5 A. What was your question?</p> <p>6 Q. Could you pronounce that</p> <p>7 person's name for me?</p> <p>8 A. Kyung Ji Ree, and it is actually</p> <p>9 Kyung Ji Kate Ree.</p> <p>10 Q. And who was Ms. Ree?</p> <p>11 A. Ms. Ree was one of the leaders</p> <p>12 in -- in a Brooklyn organization called</p> <p>13 New Leadership.</p> <p>14 Q. Now, there is a reference under</p> <p>15 Ms. Ree's name "Search and seizure at</p> <p>16 Medgar Evers." Do you see that?</p> <p>17 A. I see that.</p> <p>18 Q. Is that a typo?</p> <p>19 A. Is what a typo?</p> <p>20 Q. Well, was there a search and</p> <p>21 seizure at Medgar Evers?</p> <p>22 A. Yes.</p> <p>23 Q. And how did it relate to you, if</p> <p>24 at all?</p> <p>25 A. Her offices were raided. She</p>	<p style="text-align: right;">Page 168</p> <p>1 WILSON</p> <p>2 administration referred to is there?</p> <p>3 A. At that time, this is in 2012 I</p> <p>4 spoke with him by phone, and he told me he</p> <p>5 met with a group of Brooklyn College</p> <p>6 administrators and -- who said that I had</p> <p>7 been stealing.</p> <p>8 Q. And that was in 2012?</p> <p>9 A. In 2012.</p> <p>10 Q. Have you spoken to Mr. Marcado</p> <p>11 about being a witness in this case?</p> <p>12 A. No. Actually I did speak to</p> <p>13 him about being a witness a number of</p> <p>14 months ago.</p> <p>15 Q. What did he say?</p> <p>16 A. He said he doesn't remember that</p> <p>17 much about that time.</p> <p>18 Q. Okay. That time being 2012,</p> <p>19 right?</p> <p>20 A. 2012.</p> <p>21 Q. The next entry is number 47</p> <p>22 Ronald Mason, Esquire?</p> <p>23 A. Right.</p> <p>24 Q. It says, "Witness to economic</p> <p>25 damage and nonemployability because of</p>
<p style="text-align: right;">Page 167</p> <p>1 WILSON</p> <p>2 had an office at Medgar Evers. Her</p> <p>3 office was raided by CUNY. Her computers</p> <p>4 and documents were seized.</p> <p>5 Q. And did that have something to</p> <p>6 do with you?</p> <p>7 A. Subsequent to that raid she</p> <p>8 contacted me and asked me to assist at</p> <p>9 worker education in her organization.</p> <p>10 Q. When were her offices at Medgar</p> <p>11 Evers raided according to you?</p> <p>12 A. I don't know the exact date.</p> <p>13 Q. What year?</p> <p>14 A. I don't know the year.</p> <p>15 Q. Was it before or after January</p> <p>16 of 2012?</p> <p>17 A. Before.</p> <p>18 Q. Number 46 refers to Dean Juan</p> <p>19 Marcado. Do you see that, sir?</p> <p>20 A. I see it.</p> <p>21 Q. It says "Told by BC</p> <p>22 administration, Isaacson, Wilson was</p> <p>23 stealing." Do you see that?</p> <p>24 A. Right.</p> <p>25 Q. Do you know who the BC</p>	<p style="text-align: right;">Page 169</p> <p>1 WILSON</p> <p>2 defamation deterrent to teaching,</p> <p>3 consulting positions." Do you see that?</p> <p>4 A. Right.</p> <p>5 Q. When was the last time you spoke</p> <p>6 with Ronald Mason?</p> <p>7 A. Maybe a year or so ago.</p> <p>8 Q. And have you spoken to Mr. Mason</p> <p>9 about employment opportunities?</p> <p>10 A. Yes, I did.</p> <p>11 Q. When?</p> <p>12 A. A year or so or two years ago.</p> <p>13 One or two years.</p> <p>14 Q. And what did Mr. Mason tell you?</p> <p>15 A. Well, not only teaching</p> <p>16 opportunities but other opportunities, and</p> <p>17 then a number of months later I spoke to</p> <p>18 him, and he told me he Googled me and saw</p> <p>19 the New York Times article.</p> <p>20 Q. And?</p> <p>21 A. And since that time he hasn't</p> <p>22 followed up with any opportunities that I</p> <p>23 think were initially available.</p> <p>24 Q. Number 49 at the bottom of page</p> <p>25 7, Bob Hennelly, H-E-N-N-E-L-L-Y, right?</p>

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1 WILSON
2 A. That may be misspelled, but yes.
3 Q. At the top of page 8 it says
4 "Wouldn't use plaintiff's quote for
5 publication because of defamatory
6 publications." Do you see that?
7 A. Yes.
8 Q. Do you have an understanding of
9 what that means?
10 A. I can only tell you what he said
11 to me.
12 Q. What did he say to you?
13 A. He asked me for a quote for the
14 newspaper, which I provided. He said it
15 is a great quote, and then he called me
16 back and said unfortunately my managing
17 editor will not allow us to use your quote
18 because of the New York Times article.
19 Q. And when did you have this
20 conversation with Mr. Hennelly?
21 A. In 2019.
22 Q. When did you give him the quote?
23 A. They have gave him -- oh, in
24 2019.
25 Q. Okay. And number 51, Robin

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1 WILSON
2 Kelly, Mr. Kelly or Professor Kelly is one
3 of your expert witnesses in this case,
4 correct?
5 A. That's correct.
6 Q. Did you seek employment
7 opportunities with Mr. Kelly?
8 A. I mentioned -- I saw him at a
9 conference, which he may not even recall.
10 He was a panelist, and I mentioned I was
11 looking for work.
12 Q. When was this?
13 A. That conference was probably in
14 like 2018. About 2018 I believe. 2017,
15 2018. Maybe 2017.
16 Q. So 2017 or 2018?
17 A. Uh-huh.
18 Q. That is a yes?
19 A. Yes.
20 Q. So you --
21 A. Approximately.
22 Q. You told Dr. Kelly that you were
23 looking for work?
24 A. I just mentioned it, yes.
25 Q. What did he say, if anything?

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1 WILSON
2 A. He didn't -- he didn't mention
3 much at that time. He said okay or --
4 Q. Has he ever gotten back to you
5 about employment opportunities?
6 A. No.
7 Q. Did he tell you that he was
8 unable to assist you with academic
9 appointments and referrals?
10 A. No.
11 Q. Number 53, Bill Henning,
12 H-E-N-N-I-N-G, it says "Repeated
13 defamatory remarks." Do you see that?
14 A. Yes.
15 Q. And what defamatory remarks did
16 he repeat?
17 A. That I was a thief.
18 Q. When did he repeat that?
19 A. That would have been in 2013,
20 2014.
21 Q. Did he tell you whose defamatory
22 remarks he was repeating?
23 A. Well, it was based on the New
24 York Times article, so I guess it would
25 be closer to 2014 that he repeated it.

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1 WILSON
2 Q. Okay. So who did he repeat
3 these defamatory remarks to?
4 A. Numerous people but among them
5 would have been Don Tuminaro.
6 Q. And he was repeating defamatory
7 remarks that he saw in the New York Times
8 article, correct?
9 A. Yes, and I am not sure what
10 other sources, but that was at least one
11 of the sources.
12 Q. All right. Number 55 there is
13 an entry for Juan Gonzalez, correct?
14 A. Correct.
15 Q. And it refers to a "Loss of
16 research grant for labor broadcast
17 project." Do you see that?
18 A. I see that.
19 Q. Was that a grant that you had
20 personally?
21 A. Not a personal grant. A project
22 grant that I was working on with him.
23 Q. Where?
24 A. Well, at that time I was at
25 Brooklyn College.

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1 WILSON
2 Q. So when did you lose this
3 research grant?
4 A. That would have been in 2012.
5 Q. And what grant was that?
6 A. It was a -- it was a grant to
7 develop -- we were securing a grant --
8 actually I think we had a grant commitment
9 to develop a proposal for a labor
10 broadcast project.
11 Q. And this was a grant that you
12 were applying for in 2012 and didnt get;
13 is that right?
14 A. Correct.
15 Q. Number 56 is an entry from
16 Professor Emeritus Don Watkins, correct?
17 A. Correct.
18 Q. Is Professor Watkins alive?
19 A. No.
20 Q. Number 58, James Murray?
21 A. Yes.
22 Q. There is a reference to
23 "knowledge regarding collection and
24 historical value of plaintiff's archival
25 work and collections." Do you see that?

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1 WILSON
2 A. I see that.
3 Q. When was the last time you spoke
4 with Mr. Murray?
5 A. Sometime in 2018.
6 Q. Have you asked Mr. Murray to be
7 a witness in this case?
8 A. Yes.
9 Q. Has he agreed to be a witness?
10 A. No.
11 Q. Did he tell you why not?
12 A. Yes.
13 Q. What did he tell you?
14 A. Because he signed nondisclosure
15 papers with the New York Public Library,
16 and he wouldn't be able to go into details
17 about his work or my collection.
18 Q. Okay. I would like to direct
19 your attention to page 11 of Exhibit 1,
20 "The value of damaged documents and
21 properties by category, Professor Wilson,"
22 and then you have a date 6/3/18. Do you
23 see that, sir?
24 A. Not yet. Where is that?
25 Q. Page 11.

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1 WILSON
2 A. Page 11.
3 A. Okay.
4 Q. Now, am I correct is that a
5 date, June 3, 2018?
6 A. 6/3/18. Yes. I believe so.
7 Q. What is the significance, if
8 any, of that date?
9 A. That was probably the date that
10 this was drafted.
11 Q. Okay. You have a heading
12 "Books" under there, correct?
13 A. Yes.
14 Q. And then you list International
15 Encyclopedia of Revolution and Protest
16 eight volumes.
17 A. Yes.
18 Q. And you place a value of \$1,790
19 on it?
20 A. Correct.
21 Q. Where in your office or offices
22 were these books located?
23 A. That was in my office at the
24 Graduate Center For Worker Education.
25 Q. So that was in the area of the

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1 WILSON
2 special books that you wrote on Exhibit 2?
3 A. Yes.
4 Q. How did you arrive at that time
5 value?
6 A. It is market value.
7 Q. And how did you determine that
8 that was the market value?
9 A. Amazon.
10 Q. Okay. Now, how big were these
11 books?
12 A. Regular books like this. I
13 don't know the exact dimension.
14 Q. Well, how many pages was in each
15 volume approximately?
16 A. Approximately 300.
17 Q. So there were eight volumes of
18 approximately 300 pages each?
19 A. That's correct.
20 Q. Under that you have
21 "approximately 50 signed publications
22 acquired from authors, public lectures,"
23 et cetera. Do you see that, sir?
24 A. Yes.
25 Q. Where were these books located?

45 (Pages 174 - 177)

<p style="text-align: right;">Page 178</p> <p>1 WILSON</p> <p>2 A. Also in this bookshelf.</p> <p>3 Q. The same bookshelf where you</p> <p>4 marked special books on Exhibit 2, right?</p> <p>5 A. Correct.</p> <p>6 Q. And there were 50 of them,</p> <p>7 right?</p> <p>8 A. Approximately.</p> <p>9 Q. Approximately 50.</p> <p>10 And you ascribe a value of \$200</p> <p>11 per volume for a total of \$10,000; is that</p> <p>12 right?</p> <p>13 A. That's correct.</p> <p>14 Q. How did you arrive at that</p> <p>15 value?</p> <p>16 A. By looking on Amazon for the</p> <p>17 value of signed copies, so that was an</p> <p>18 approximate value for some of</p> <p>19 these -- some of these.</p> <p>20 Q. Well, you have I see twelve</p> <p>21 names here, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Did these 12 people write all 50</p> <p>24 books that you are referring to here?</p> <p>25 A. No. Some of them wrote multiple</p>	<p style="text-align: right;">Page 180</p> <p>1 WILSON</p> <p>2 Q. All right.</p> <p>3 A. In a vertical filing cabinet.</p> <p>4 Q. So with reference to Exhibit 2,</p> <p>5 which is your drawing of your office at 25</p> <p>6 Broadway, where was this filing cabinet</p> <p>7 with three cubic feet of lecture notes</p> <p>8 located?</p> <p>9 A. Actually it is not quite that</p> <p>10 simple. So some of the lecture notes</p> <p>11 would have been in my -- in one of my</p> <p>12 filing cabinets.</p> <p>13 Q. You are pointing to the filing</p> <p>14 cabinet to the right of your desk?</p> <p>15 A. To the right. So that would --</p> <p>16 Q. That is the north side of the</p> <p>17 office as you have drawn it, right?</p> <p>18 A. No, it is not north. That</p> <p>19 would be --</p> <p>20 MR. JAMES KLEIN: He meant just</p> <p>21 on this side of the page.</p> <p>22 A. Yes. Yes.</p> <p>23 Q. You have two desks, one towards</p> <p>24 the north side and the other one towards</p> <p>25 the south side?</p>
<p style="text-align: right;">Page 179</p> <p>1 WILSON</p> <p>2 editions, and then there were others who I</p> <p>3 couldn't necessarily remember.</p> <p>4 Q. How many of the books were you</p> <p>5 able to look up on Amazon?</p> <p>6 A. I don't recall the number.</p> <p>7 Q. Was it more than five?</p> <p>8 A. Yes, more than five.</p> <p>9 Q. Was it more than ten?</p> <p>10 A. I don't remember.</p> <p>11 Q. Okay. Below that you list</p> <p>12 lecture notes, correct?</p> <p>13 A. Yes.</p> <p>14 Q. And you say there is</p> <p>15 approximately three cubic feet of lecture</p> <p>16 notes created from 1979 to 2016, right?</p> <p>17 A. Yes.</p> <p>18 Q. Where were these lecture notes</p> <p>19 kept?</p> <p>20 A. Actually just to clarify, that</p> <p>21 was in one location. I had stored</p> <p>22 lecture notes in different locations, but</p> <p>23 in one location at -- at my office at 25</p> <p>24 Broadway they were kept in a filing</p> <p>25 cabinet.</p>	<p style="text-align: right;">Page 181</p> <p>1 WILSON</p> <p>2 A. Yes.</p> <p>3 Q. So you pointed to an X to the</p> <p>4 right of the desk that is located towards</p> <p>5 the north side of the office as you've</p> <p>6 drawn it, right?</p> <p>7 A. Right.</p> <p>8 Q. And so some of the lecture notes</p> <p>9 were in that filing cabinets; is that</p> <p>10 right?</p> <p>11 A. That's correct.</p> <p>12 Q. And were any lecture notes</p> <p>13 located anywhere else in your office?</p> <p>14 A. Yes.</p> <p>15 Q. Where?</p> <p>16 A. I had lecture notes on my</p> <p>17 bookshelves.</p> <p>18 Q. And that is along the east wall</p> <p>19 of the office?</p> <p>20 A. That's correct.</p> <p>21 Q. Anywhere else?</p> <p>22 A. Yes. I had lecture notes in my</p> <p>23 assistant's office.</p> <p>24 Q. So outside of this office,</p> <p>25 correct?</p>

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1 WILSON
2 A. Yes.
3 Q. Anywhere else?
4 A. Yes. And I had lecture notes
5 in a storage closet.
6 Q. A storage closet at 25 Broadway?
7 A. Yes.
8 Q. And all together these lecture
9 notes were approximately three cubic feet
10 in volume?
11 A. No, it just perhaps in my office
12 would have been on the shelves and in the
13 desk, but there were more in my
14 assistant's office, more in the storage,
15 and then more on the main campus.
16 Q. Now, below that there is a
17 reference to personnel files, right, Dr.
18 Wilson?
19 A. Yes.
20 Q. Now, you are referring to files
21 relating to your own employment; is that
22 right, at the bottom of page 11?
23 A. Personnel files. And what is
24 your question?
25 Q. Those relates to files

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1 WILSON
2 concerning your own employment history?
3 A. Well, yes, but it included other
4 personnel as well. But yes, my --
5 Q. Where were these personnel files
6 as you've referred to them located?
7 A. Those would have been maybe in
8 the -- actually most of my personnel
9 files, not all, but most were on the main
10 campus in my office.
11 Q. And what was in these personnel
12 files?
13 A. Professional activities, grants.
14 Professional activities, grants, my
15 academic resume, promotion and tenure
16 files, letters of peer review for
17 promotion and tenure from leading experts
18 some of whom I remember.
19 Q. What letters do you remember?
20 A. A Yale University historian
21 named David Montgomery.
22 Q. Anybody else?
23 A. Yes, I believe Charles Hamilton,
24 who was a professor of government at
25 Columbia University. I think there was a

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1 WILSON
2 letter from David Levering Lewis, who was
3 a distinguished professor at Rutgers
4 University. There were others, but I
5 can't remember off the top of my head.
6 Q. You said most of your personal
7 files were located on the main campus,
8 right?
9 A. Most of my personnel files, not
10 personal.
11 Q. I meant personnel.
12 A. Okay.
13 Q. Where on the main campus?
14 A. In my office in James Hall in my
15 political science office.
16 Q. So you had an office at 25
17 Broadway and one in James Hall on the main
18 campus in Brooklyn, correct?
19 A. Partially correct.
20 Q. In what way wasn't it accurate?
21 A. I had an additional office at
22 Brooklyn College at the Center For
23 Diversity. I was director there.
24 Q. Did you have any files at your
25 office at the Center for Diversity?

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1 WILSON
2 A. Yes.
3 Q. What files did you have there?
4 A. I had one filing cabinet filled
5 with student records, participants in
6 programs I administered, and projects
7 pertaining to the Center For Diversity.
8 And then I also had research files
9 pertaining to issues of race, affirmative
10 action, so forth.
11 Q. And where were these research
12 files at the Center For Diversity?
13 A. In the administrative office at
14 the Center For Diversity.
15 Q. So that wasn't your office?
16 A. My personal -- it was the
17 director's office. I was the director,
18 so it was my office. Yes.
19 Q. And were these research files
20 locked?
21 A. I think one was locked, and one
22 was unlocked.
23 Q. And what volume of research
24 files did you have at this office at the
25 Center For Diversity?

<p style="text-align: right;">Page 186</p> <p>1 WILSON</p> <p>2 A. Both the locked and unlocked</p> <p>3 would have been maybe six cubic feet file</p> <p>4 cabinet top and bottom filled.</p> <p>5 Q. Do you know what research files</p> <p>6 were in the locked file?</p> <p>7 A. That would have pertained to</p> <p>8 student research records pertaining to one</p> <p>9 of the programs I administered.</p> <p>10 Q. What was in the unlocked file?</p> <p>11 A. Issues dealing with racial</p> <p>12 discrimination, affirmative action,</p> <p>13 diversity in higher education, also</p> <p>14 policies that I developed at the City</p> <p>15 University. There may have been some</p> <p>16 other research files pertaining to faculty</p> <p>17 research.</p> <p>18 Q. Were these research files your</p> <p>19 personal research files?</p> <p>20 A. I created them.</p> <p>21 Q. Were they your personal research</p> <p>22 files?</p> <p>23 A. I don't know how to answer that</p> <p>24 question.</p> <p>25 Q. When you say you created, what</p>	<p style="text-align: right;">Page 188</p> <p>1 WILSON</p> <p>2 of looking at my manuscripts, which were</p> <p>3 part of my personnel files, these</p> <p>4 faculty -- you know, letters of</p> <p>5 recommendation, teaching evaluations,</p> <p>6 grants and documents and awards. And so</p> <p>7 this was an estimate of the historical</p> <p>8 value that I placed on it, so that is the</p> <p>9 best I could tell you.</p> <p>10 Q. Now, the manuscripts that you</p> <p>11 are referring to, these are the</p> <p>12 manuscripts of the books that you</p> <p>13 published?</p> <p>14 A. They were copies of my published</p> <p>15 manuscripts, yes.</p> <p>16 Q. These manuscripts, did you</p> <p>17 prepare them on a computer or were they</p> <p>18 hand typed?</p> <p>19 A. A combination of handwritten</p> <p>20 notes, typed, typewritten in the old days.</p> <p>21 We had type writers, and then some were</p> <p>22 created on a computer.</p> <p>23 Q. Did you ever scan into a</p> <p>24 computer any of your manuscripts?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 187</p> <p>1 WILSON</p> <p>2 do you mean?</p> <p>3 A. Well, the research would consist</p> <p>4 of taking articles from multiple sources</p> <p>5 and then making notations adding yellow</p> <p>6 pads, clipping Post-It notes. So that is</p> <p>7 what I mean on those articles and notes.</p> <p>8 What I mean in terms of policies, these</p> <p>9 were policies that I developed, but the</p> <p>10 policies were subsequently adopted by the</p> <p>11 University and by the college, so they</p> <p>12 weren't my personal policies, but I</p> <p>13 developed them. I am not sure if that is</p> <p>14 your question.</p> <p>15 Q. No, I think you've answered the</p> <p>16 question.</p> <p>17 Now, you placed a historical</p> <p>18 value on your personnel files of 75,000,</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. That's \$75,000?</p> <p>22 A. Yes.</p> <p>23 Q. How did you arrive at that</p> <p>24 number?</p> <p>25 A. Well, my -- it was an estimate</p>	<p style="text-align: right;">Page 189</p> <p>1 WILSON</p> <p>2 Q. At the top of page 12, the</p> <p>3 following sentence appears or phrase</p> <p>4 "Professional value for future potential</p> <p>5 employment to document salary," and there</p> <p>6 is a word B-E-F-I-T enchantment. Do you</p> <p>7 see that?</p> <p>8 A. Yes.</p> <p>9 Q. What IS befit enchantment</p> <p>10 /SKWR-RBGS?</p> <p>11 A. I think befit must have been a</p> <p>12 typo for benefit, and I am not sure what</p> <p>13 that other word meant.</p> <p>14 Q. You place a value, a</p> <p>15 professional value of these materials for</p> <p>16 future potential employment of \$200,000,</p> <p>17 right?</p> <p>18 A. Right.</p> <p>19 Q. How do you arrive at that?</p> <p>20 A. Well, I was considering the loss</p> <p>21 of income for foundation work and for</p> <p>22 research that was immediately related to</p> <p>23 my loss of employment.</p> <p>24 Q. And is it your testimony that</p> <p>25 you couldn't get foundation work because</p>

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<p style="text-align: right;">Page 190</p> <p>1 WILSON</p> <p>2 you didn't have access to your manuscripts</p> <p>3 and your CV?</p> <p>4 A. Well, it is more complicated in</p> <p>5 that when you don't have access to your</p> <p>6 research data, to your documents, to your</p> <p>7 ability to document your standing in the</p> <p>8 profession, basically when the tools of</p> <p>9 the trade are taken from you it's -- it</p> <p>10 makes finding future employment in that</p> <p>11 area significantly more difficult if not</p> <p>12 impossible.</p> <p>13 Q. One of the things you said was</p> <p>14 in your personnel files was a "Definitive</p> <p>15 ACV, correct?</p> <p>16 A. Yes.</p> <p>17 Q. Is that the only copy you had of</p> <p>18 your --</p> <p>19 A. Of that particular -- yes, it is</p> <p>20 called a -- it is called an academic</p> <p>21 curriculum vitae. That was the only</p> <p>22 copy.</p> <p>23 Q. And you are incapable of</p> <p>24 duplicating it. Is that it?</p> <p>25 A. Impossible.</p>	<p style="text-align: right;">Page 192</p> <p>1 WILSON</p> <p>2 case, pages 11, 12, and the top, the very</p> <p>3 top of 13 is set forth the value of</p> <p>4 damaged documents and property by category</p> <p>5 with regard to your personal property that</p> <p>6 you said was taken and not returned; is</p> <p>7 that correct?</p> <p>8 A. That's correct.</p> <p>9 Q. And there are various amounts,</p> <p>10 dollar amounts ascribed to the loss of</p> <p>11 that personnel property on pages 11 and</p> <p>12 the very top of page 13, correct?</p> <p>13 A. 11 and 13.</p> <p>14 Q. 11, 12. And the top of 13.</p> <p>15 A. Yes.</p> <p>16 Q. And those dollar amounts were</p> <p>17 arrived at before you retained expert</p> <p>18 witnesses in this case, correct?</p> <p>19 A. That's correct.</p> <p>20 Q. Now, are you deferring to your</p> <p>21 expert witnesses for the valuations of the</p> <p>22 property that was lost and not returned to</p> <p>23 you?</p> <p>24 A. Yes.</p> <p>25 Q. So the dollar amounts that are</p>
<p style="text-align: right;">Page 191</p> <p>1 WILSON</p> <p>2 Q. All right. Going to --</p> <p>3 A. I am going to --</p> <p>4 Q. You want to take a break?</p> <p>5 A. Yes.</p> <p>6 Q. Fine.</p> <p>7 (Recess taken.)</p> <p>8 MR. MARK KLEIN: Back on the</p> <p>9 record.</p> <p>10 Q. Dr. Wilson, is there any</p> <p>11 testimony you gave before you just took a</p> <p>12 break that you would like to change or</p> <p>13 modify?</p> <p>14 A. Not at this moment, but I do</p> <p>15 have a question. What time are we going</p> <p>16 to continue to?</p> <p>17 MR. MARK KLEIN: We don't need</p> <p>18 to do this on the record. Off the</p> <p>19 record.</p> <p>20 (Discussion held off the</p> <p>21 record.)</p> <p>22 MR. MARK KLEIN: Back on the</p> <p>23 record.</p> <p>24 Q. Dr. Wilson, back to Exhibit 1,</p> <p>25 which is your initial disclosures in this</p>	<p style="text-align: right;">Page 193</p> <p>1 WILSON</p> <p>2 listed on pages 11, 12, and on top of 13</p> <p>3 are not the amounts you are seeking for</p> <p>4 the personal property that you say was</p> <p>5 taken and not returned, right?</p> <p>6 A. Let me just look at this for a</p> <p>7 second here.</p> <p>8 (Pause.)</p> <p>9 A. Well the oak -- I just lost my</p> <p>10 place here. I think for the oak easel and</p> <p>11 for the Apple monitor, you know, it's</p> <p>12 pretty accurate.</p> <p>13 MR. JAMES KLEIN: I have a</p> <p>14 question about that. I mean this is our</p> <p>15 initial disclosure, and then we submitted</p> <p>16 the expert reports as a Supplemental</p> <p>17 Disclosure, so I don't think that having</p> <p>18 Supplemental Disclosure necessarily means</p> <p>19 that our initial disclosure is off the</p> <p>20 table.</p> <p>21 MR. MARK KLEIN: That is what I</p> <p>22 am asking Dr. Wilson.</p> <p>23 A. All right. I mean on the major</p> <p>24 issues I would defer to the experts, but</p> <p>25 on the oak easel and the Apple monitor I</p>

49 (Pages 190 - 193)

<p style="text-align: right;">Page 194</p> <p>1 WILSON</p> <p>2 would abide by those, and others I would</p> <p>3 defer to experts.</p> <p>4 Q. Tell me about the oak easel that</p> <p>5 is an easel you said was your wife's?</p> <p>6 A. My wife's oak easel.</p> <p>7 Q. And that was an easel that you</p> <p>8 used to display the schedule at the</p> <p>9 Graduate Center For Worker Education; is</p> <p>10 that right?</p> <p>11 A. So my -- my wife does art, and</p> <p>12 she had a -- an arts easel, solid oak</p> <p>13 easel, and she suggested and I asked</p> <p>14 actually if I could use that because we</p> <p>15 needed a display for students and for</p> <p>16 events and so forth, and so it was a very</p> <p>17 nice solid oak easel, and I looked at</p> <p>18 easels, solid oak easels, and that was the</p> <p>19 range.</p> <p>20 Q. And you say that easel was never</p> <p>21 returned to you; is that right?</p> <p>22 A. Never returned but I asked for</p> <p>23 it.</p> <p>24 Q. And the Apple 36 inch monitor,</p> <p>25 is that supposed to be Apple spelled</p>	<p style="text-align: right;">Page 196</p> <p>1 WILSON</p> <p>2 Q. Where was that located?</p> <p>3 A. On my desk.</p> <p>4 Q. On your desk towards the north</p> <p>5 side of the room?</p> <p>6 A. Yes.</p> <p>7 Q. Now, going back you refer to</p> <p>8 further up on the page on page 12 you</p> <p>9 refer to the loss of 30 years of</p> <p>10 professional letters, correct?</p> <p>11 A. Correct.</p> <p>12 Q. And one of those letters was</p> <p>13 from -- is listed here as quote "from</p> <p>14 Harry S. Truman to Charles Wilson,"</p> <p>15 correct?</p> <p>16 A. Yes, correct.</p> <p>17 Q. Charles Wilson was your father?</p> <p>18 A. That's correct. That's right.</p> <p>19 Q. And another of those letters was</p> <p>20 a letter from Ray Charles; is that right?</p> <p>21 A. Yes.</p> <p>22 Q. What was that letter?</p> <p>23 A. So in the late 1970s Ray Charles</p> <p>24 was involved in a political controversy,</p> <p>25 and I wrote him a letter, you know,</p>
<p style="text-align: right;">Page 195</p> <p>1 WILSON</p> <p>2 A-P-P-L-E?</p> <p>3 MR. JAMES KLEIN: What page are</p> <p>4 you we on now?</p> <p>5 MR. MARK KLEIN: We are on page</p> <p>6 12.</p> <p>7 A. Yes, that is Apple misspelled by</p> <p>8 the paralegal or whoever ultimately typed</p> <p>9 it.</p> <p>10 Q. And what year monitor was that?</p> <p>11 A. That would have been -- that</p> <p>12 would have been about 2011. 2010, 2011.</p> <p>13 Q. And that was your own monitor?</p> <p>14 A. My personal monitor, yes.</p> <p>15 Q. Where was it?</p> <p>16 A. It was in my office at the</p> <p>17 Graduate Center For Worker Education on</p> <p>18 one of my desks.</p> <p>19 Q. And what size monitor was it?</p> <p>20 A. A 36-inch office at the graduate</p> <p>21 center?</p> <p>22 A. The Graduate Center For Worker</p> <p>23 Education.</p> <p>24 Q. Are you guessing or estimating?</p> <p>25 A. I am estimating.</p>	<p style="text-align: right;">Page 197</p> <p>1 WILSON</p> <p>2 raising the issue of his politics, and</p> <p>3 then he wrote a three-page letter back to</p> <p>4 me pretty much defending himself and -- so</p> <p>5 that was the nature of that exchange, and</p> <p>6 so it was a pretty rare exchange, and it</p> <p>7 was a very passionate letter from Ray</p> <p>8 Charles, so --</p> <p>9 Q. Now, how many letters are you</p> <p>10 referring to here that you say were lost?</p> <p>11 A. Well, I -- I don't know the</p> <p>12 total because it is over 30 years, but we</p> <p>13 are talking hundreds, hundreds and</p> <p>14 hundreds of letters.</p> <p>15 Q. And where were these letters</p> <p>16 kept?</p> <p>17 A. I had a letter file on the main</p> <p>18 campus in my office in political science.</p> <p>19 There were some letters in the Center For</p> <p>20 Diversity. I had letters in -- one of my</p> <p>21 desk drawers. I am not sure which one.</p> <p>22 Q. You are pointing to the desk</p> <p>23 towards the north side of your office?</p> <p>24 A. Yes, I had some letters there?</p> <p>25 A. And then I also had letters in</p>

50 (Pages 194 - 197)

<p style="text-align: right;">Page 198</p> <p>1 WILSON</p> <p>2 storage that would have either been</p> <p>3 in -- yes, that would have been in the</p> <p>4 Graduate Center For Worker Education</p> <p>5 storage closet.</p> <p>6 Q. Where was the Ray Charles</p> <p>7 letter?</p> <p>8 A. On the main campus.</p> <p>9 Q. In your office in James Hall in</p> <p>10 the main campus?</p> <p>11 A. In my political science office.</p> <p>12 Q. And --</p> <p>13 A. In James Hall.</p> <p>14 Q. And where in your office at</p> <p>15 James Hall was this letter?</p> <p>16 A. That would have been in my file</p> <p>17 cabinet in -- I had several file cabinets,</p> <p>18 so it was in one of several file cabinets.</p> <p>19 I had different desks. So it was in one</p> <p>20 of my desk filing cabinets.</p> <p>21 Q. Now, the letter from Harry S.</p> <p>22 Truman to your father, when was that</p> <p>23 letter written?</p> <p>24 A. Actually that was a letter from</p> <p>25 Roosevelt.</p>	<p style="text-align: right;">Page 200</p> <p>1 WILSON</p> <p>2 is a reference to a letter from Truman.</p> <p>3 Do you see that?</p> <p>4 A. Same mistake.</p> <p>5 Q. So you are talking about the</p> <p>6 same letter in the first paragraph as well</p> <p>7 as under archival records?</p> <p>8 A. I don't see it on the</p> <p>9 page -- no, that is the one I was talking</p> <p>10 about.</p> <p>11 MR. JAMES KLEIN: It is up here.</p> <p>12 Q. So there are two references to</p> <p>13 Harry S. Truman, right?</p> <p>14 A. Right.</p> <p>15 Q. And both of them are intended to</p> <p>16 refer to a letter from Roosevelt to your</p> <p>17 father?</p> <p>18 A. That's right, correspondence</p> <p>19 between the two.</p> <p>20 MR. JAMES KLEIN: I think he</p> <p>21 means Franklin Roosevelt to be complete.</p> <p>22 A. FDR, not Theodore.</p> <p>23 Q. But you place a value on the</p> <p>24 letter -- it says "letter from Truman."</p> <p>25 You are referring to the letter from</p>
<p style="text-align: right;">Page 199</p> <p>1 WILSON</p> <p>2 Q. Why does it say from Harry S.</p> <p>3 Truman instead of Roosevelt because I</p> <p>4 think the -- the typo said president, and</p> <p>5 maybe it got lost in the translation by</p> <p>6 the paralegal, and I -- so but it was just</p> <p>7 a typo, but it was President Roosevelt,</p> <p>8 and it was with a series of letters in a</p> <p>9 folder from my father.</p> <p>10 Q. And where was this folder?</p> <p>11 A. And that folder was on the main</p> <p>12 campus.</p> <p>13 Q. Where in the main campus?</p> <p>14 A. At Brooklyn College in one my</p> <p>15 files.</p> <p>16 Q. Was the file named or labeled?</p> <p>17 A. Well, every file that I had, you</p> <p>18 know, was sequential and organized, so it</p> <p>19 would have said dad or something on top or</p> <p>20 my father or father's letters or something</p> <p>21 to that affect.</p> <p>22 Q. Now --</p> <p>23 A. I am sorry. I wrote on your</p> <p>24 document.</p> <p>25 Q. So further down the page there</p>	<p style="text-align: right;">Page 201</p> <p>1 WILSON</p> <p>2 Roosevelt?</p> <p>3 A. Correct.</p> <p>4 Q. To your father at 150,000,</p> <p>5 right?</p> <p>6 A. Right.</p> <p>7 Q. And farther up on the page you</p> <p>8 refer to loss of over 30 years of</p> <p>9 professional letters including the one</p> <p>10 from Harry S. Truman to Charles Wilson,</p> <p>11 which you said should say from Roosevelt,</p> <p>12 FDR, to your father at a total of</p> <p>13 \$250,000, right?</p> <p>14 A. That is what I mentioned, yes.</p> <p>15 Q. Now, also under the heading</p> <p>16 archival records, do you see that?</p> <p>17 A. I do.</p> <p>18 Q. There is a reference to Don</p> <p>19 Watkins papers?</p> <p>20 A. Yes.</p> <p>21 Q. And what are those?</p> <p>22 A. So Don Watkins was a</p> <p>23 distinguished professor at CUNY, who was</p> <p>24 aware of my archival expertise, and he was</p> <p>25 getting up in years, and he wanted me to</p>

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1 WILSON
2 process and archive and preserve his
3 decades of civil rights work and activism
4 primarily, and so I agreed, and he started
5 giving me boxes of his material to process
6 for archiving.
7 Q. Where were Don Watkins' papers
8 kept by you?
9 A. They were kept in boxes at -- in
10 my office at the Graduate Center For
11 Worker Education.
12 Q. In the office diagram that you
13 have drawn on Exhibit 2?
14 A. Yes, not on the shelves, but I
15 think they were just in boxes by the side
16 of my desk, and it was a
17 separate -- separate series of two or
18 three boxes, and I believe he -- he had a
19 stack of -- not I believe. I know he
20 gave me a stack of magazines from the
21 1960s. As I recall, it was like a Ebony
22 Magazine and Life Magazine and March on
23 Washington. So there was a stack, and I
24 had one stack on one of my shelves here
25 and then various documents from the

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1 WILSON
2 students on violence coordinating
3 committees from different organizations
4 that he worked with, letters,
5 correspondence, you know,
6 things -- important things from that
7 period.
8 Q. So you had two or three boxes of
9 materials that Don Watkins had given you
10 and a stack of magazines; is that right?
11 A. That's right.
12 Q. And what size boxes were these?
13 A. These boxes would have been like
14 I said about two and a half feet
15 approximately. So, you know --
16 Q. Two and a half feet?
17 A. About two and a half feet by a
18 foot and a half. They were fairly big
19 boxes.
20 Q. What color were these boxes?
21 A. Standard cardboard boxes.
22 Q. Were they bankers boxes?
23 A. No, I am not sure what a bankers
24 box is actually. Maybe they were, but
25 what do you mean by bankers box?

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1 WILSON
2 Q. That is a particular kind of
3 box.
4 A. I am not familiar with a bankers
5 box.
6 MR. JAMES KLEIN: It is a box
7 they use for archiving records.
8 Q. Also under archival records, you
9 refer to a photo of WEB Debevois. Do you
10 see that?
11 A. Hold on. I don't see it yet.
12 Q. What photo was that?
13 A. That was a photo that was
14 actually hanging on my wall at the
15 Graduate Center For Worker Education, and
16 it was a photo of WEB Debevois.
17 Q. And where did you get the photo?
18 A. That photo was given to me by I
19 believe it was by Benjamin MacLawrence.
20 Q. Now, did you have insurance on
21 any of these letters, archival records,
22 research papers or books?
23 A. No. What do you mean by
24 insurance?
25 Q. Did you have insurance? You know

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1 WILSON
2 what insurance is?
3 A. My understanding of insurance
4 because whenever this issue came up was
5 that the university itself is insured, so
6 that is my understanding of insurance.
7 Q. Well, you're claiming that
8 materials for which you are seeking
9 millions of dollars in this case were your
10 personal records and documents and letters
11 and archival records and books, correct?
12 A. Correct.
13 Q. Did you personally have any
14 insurance on any of these items?
15 A. No, I had no personal insurance.
16 MR. MARK KLEIN: I am going to
17 ask the reporter to mark as Wilson Exhibit
18 4 a document titled "Defendants' First Set
19 of Interrogatories to Plaintiff."
20 (Wilson Exhibit 4 marked for
21 identification.)
22 (Document handed to witness.)
23 Q. Dr. Wilson, I showed you what
24 has been marked as Exhibit 4. You can
25 look through it if you would like, but my

<p style="text-align: right;">Page 206</p> <p>1 WILSON</p> <p>2 first and only question at this point is</p> <p>3 whether you have seen it before.</p> <p>4 A. Is there a date on this?</p> <p>5 Q. If you go to page -- to the last</p> <p>6 page, page 12, it is dated May 22, 2018.</p> <p>7 A. I am looking for my signature.</p> <p>8 Q. No, these are defendants'</p> <p>9 interrogatories to you. My question is</p> <p>10 whether you have seen this before.</p> <p>11 MR. JAMES KLEIN: These are not</p> <p>12 your responses. These are things -- the</p> <p>13 questions that they asked you. These are</p> <p>14 just questions. It doesn't have answers</p> <p>15 where you are verifying it.</p> <p>16 Have you seen these questions?</p> <p>17 Is that the question?</p> <p>18 MR. MARK KLEIN: That was the</p> <p>19 question.</p> <p>20 A. Yes, I have seen these.</p> <p>21 Q. And did you put together</p> <p>22 responses to them?</p> <p>23 A. Yes, I worked with counsel.</p> <p>24 Q. All right. I ask the reporter</p> <p>25 to mark as Wilson Exhibit 5 "Plaintiff's</p>	<p style="text-align: right;">Page 208</p> <p>1 WILSON</p> <p>2 A. I think I gave the first</p> <p>3 typewritten draft to the staff. Right.</p> <p>4 Q. Did you review the final</p> <p>5 document before it went out?</p> <p>6 A. I am not sure.</p> <p>7 Q. To the best of your knowledge,</p> <p>8 is Plaintiff's Answer to Defendant's First</p> <p>9 Set of Interrogatories true and accurate?</p> <p>10 A. I would have to go over it again</p> <p>11 carefully to make sure.</p> <p>12 Q. Are you aware of any</p> <p>13 inaccuracies in the document?</p> <p>14 A. Well, I haven't read the</p> <p>15 document, so I would have to take my time</p> <p>16 and make sure that everything was correct.</p> <p>17 MR. MARK KLEIN: I am going to</p> <p>18 ask the reporter to mark as Exhibit 6 a</p> <p>19 document titled "Verification."</p> <p>20 (Wilson Exhibit 6 marked for</p> <p>21 identification.)</p> <p>22 (Document handed to witness.)</p> <p>23 Q. Dr. Wilson, I show you what has</p> <p>24 been marked as Exhibit 6. Do you recall</p> <p>25 signing that document?</p>
<p style="text-align: right;">Page 207</p> <p>1 WILSON</p> <p>2 Answers to Defendants' First Set of</p> <p>3 Interrogatories" dated July 13, 2018.</p> <p>4 (Wilson Exhibit 5 marked for</p> <p>5 identification.)</p> <p>6 (Document handed to witness.)</p> <p>7 Q. I will show you what has been</p> <p>8 marked as Exhibit 5, sir, and we will go</p> <p>9 through this in more detail, but have you</p> <p>10 seen that before?</p> <p>11 A. Yes, I have seen this before.</p> <p>12 Q. And under that heading of the</p> <p>13 various interrogatories there are lists of</p> <p>14 information, correct?</p> <p>15 A. Yes.</p> <p>16 Q. Did you have any role in</p> <p>17 preparing the lists of information under</p> <p>18 the headings?</p> <p>19 A. Yes, I did.</p> <p>20 Q. What role did you have?</p> <p>21 A. I drew up the list and gave it</p> <p>22 to the paralegal.</p> <p>23 Q. When you say you drew up the</p> <p>24 list, in what way did you draw up the</p> <p>25 list? Did you type it?</p>	<p style="text-align: right;">Page 209</p> <p>1 WILSON</p> <p>2 A. Yes, I do.</p> <p>3 Q. That's your signatures on the</p> <p>4 page?</p> <p>5 A. Yes, it is.</p> <p>6 Q. And you declared in this</p> <p>7 Verification under penalty of perjury that</p> <p>8 the facts stated in plaintiff's answers in</p> <p>9 the first set of interrogatories were true</p> <p>10 and correct to the best of your</p> <p>11 information, knowledge, and belief?</p> <p>12 A. To the best of my knowledge.</p> <p>13 Q. To the best of your knowledge,</p> <p>14 information, and belief, right?</p> <p>15 A. That's right. I just have to</p> <p>16 confirm it and reread it and make sure</p> <p>17 that is still to the best of my knowledge.</p> <p>18 Q. Okay. Now, we are going to</p> <p>19 have to read this exhibit and this exhibit</p> <p>20 together because Exhibit 6 doesn't -- I am</p> <p>21 sorry. Exhibit 5 doesn't have the</p> <p>22 questions that you were asked.</p> <p>23 A. This doesn't have these</p> <p>24 questions?</p> <p>25 Q. This doesn't have these</p>

<p style="text-align: right;">Page 210</p> <p>1 WILSON</p> <p>2 questions.</p> <p>3 MR. JAMES KLEIN: This is the</p> <p>4 question, and that is the answer, so you</p> <p>5 have to refer to both of them.</p> <p>6 Q. So if you go to page 6 of</p> <p>7 Exhibit 4 at the bottom of the page, you</p> <p>8 see Interrogatory 1, right?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And if you go to page 1 of</p> <p>11 Exhibit 5, you see where it says</p> <p>12 Interrogatory 1, right?</p> <p>13 A. Yes.</p> <p>14 Q. And do you understand that the</p> <p>15 information that appears in A through JJ</p> <p>16 on pages 1 through 3 of Exhibit 5 is a</p> <p>17 response to an Interrogatory 1 on page 6</p> <p>18 of Exhibit 4?</p> <p>19 A. Yes.</p> <p>20 Q. And you put together the</p> <p>21 information that appears in A through JJ,</p> <p>22 correct?</p> <p>23 A. Correct.</p> <p>24 Q. I think we have gone through</p> <p>25 Interrogatory 1 or the response in</p>	<p style="text-align: right;">Page 212</p> <p>1 WILSON</p> <p>2 in this case." Do you see that sir?</p> <p>3 A. I see that.</p> <p>4 Q. So are we oriented as to what</p> <p>5 the information on pages 5 and 6 of</p> <p>6 Exhibit 5 respond to?</p> <p>7 A. Oriented. I haven't seen them</p> <p>8 yet, but yes.</p> <p>9 Q. Okay. Directing your attention</p> <p>10 to paragraph 5 under Interrogatory 3 --</p> <p>11 A. Paragraph 5.</p> <p>12 Q. -- it says "Cheng made false</p> <p>13 defamatory statements to Ivy Rich, Don</p> <p>14 Tumaniro, Steve Leberstein, and Erica</p> <p>15 Gaskins that plaintiff was stealing ad</p> <p>16 engaged in criminal conduct at GCWE,"</p> <p>17 Right?</p> <p>18 A. Yes.</p> <p>19 Q. Those are statements you</p> <p>20 testified previously took place in the end</p> <p>21 of 2012, beginning of 2013, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. If you could go to</p> <p>24 paragraph 12 at the bottom of page 5.</p> <p>25 A. Page 5. I have it.</p>
<p style="text-align: right;">Page 211</p> <p>1 WILSON</p> <p>2 connection with your initial</p> <p>3 interrogatories, so I am not going to go</p> <p>4 through it all again unless you would like</p> <p>5 me to.</p> <p>6 A. So this is now --</p> <p>7 Q. I haven't asked you a question</p> <p>8 yet.</p> <p>9 MR. JAMES KLEIN: He hasn't</p> <p>10 asked you anything yet.</p> <p>11 THE WITNESS: Okay.</p> <p>12 Q. Let me direct your attention to</p> <p>13 page 5 of Exhibit 5.</p> <p>14 A. Okay. Page 5, Exhibit 5.</p> <p>15 Q. Page 5, Exhibit 5 is a response</p> <p>16 to Interrogatory 3, correct?</p> <p>17 A. That would be on a different</p> <p>18 page.</p> <p>19 Q. That is on page 7 of Exhibit 4.</p> <p>20 All right.</p> <p>21 A. Okay.</p> <p>22 Q. Interrogatory No. 3 asks that</p> <p>23 you "Identify each and every wrongful act</p> <p>24 allegedly taken by Cheng for which</p> <p>25 plaintiff asserts a claim or seeks damages</p>	<p style="text-align: right;">Page 213</p> <p>1 WILSON</p> <p>2 MR. MARK KLEIN: For the record,</p> <p>3 Exhibit 5 also didn't have page numbers,</p> <p>4 so I handwrote in the page numbers.</p> <p>5 MR. JAMES KLEIN: I see that.</p> <p>6 Q. So paragraph 12 at the bottom of</p> <p>7 page 5 says, "Cheng engaged it ongoing</p> <p>8 defamation of plaintiff to other CUNY</p> <p>9 professors and published information in</p> <p>10 New York Times Kingsman," and then it</p> <p>11 continues on to the next page. Do you see</p> <p>12 that, sir?</p> <p>13 A. I do.</p> <p>14 Q. Can you identify any of the</p> <p>15 defamatory statements that are referred to</p> <p>16 in paragraph 12?</p> <p>17 A. The same as I mentioned in</p> <p>18 number 5 pertaining to Wilson stealing and</p> <p>19 being a criminal that he made, so that</p> <p>20 is -- that is what the reference is to.</p> <p>21 Q. So that was in 2012 and 2013,</p> <p>22 right?</p> <p>23 A. In that time frame. Let's see.</p> <p>24 Wait a minute. Hold on one second. That</p> <p>25 would have been in -- this was -- I think</p>

<p style="text-align: right;">Page 214</p> <p>1 WILSON</p> <p>2 he met with them with these groups, with</p> <p>3 these people, these individuals in 2014,</p> <p>4 and so it -- it would have been more</p> <p>5 accurate to say 2014 is when Cheng --</p> <p>6 because that is -- we will have to</p> <p>7 double-check, but that is when they told</p> <p>8 me they met with him, and they had a</p> <p>9 series of meetings with Cheng.</p> <p>10 Q. You testified earlier today that</p> <p>11 they told you they met with him in 2012</p> <p>12 and 2013?</p> <p>13 A. Yes, but I am revising that, and</p> <p>14 it would have been closer to the -- in the</p> <p>15 time frame of 2014.</p> <p>16 Q. Can you identify any defamatory</p> <p>17 statement that Mr. Cheng made in 2014?</p> <p>18 A. Well, what was reported to me</p> <p>19 was he, Cheng, did not want my</p> <p>20 photographic representation in the</p> <p>21 historical documentation of the</p> <p>22 institutional history of the Graduate</p> <p>23 Center For Worker Education, which was a</p> <p>24 project that he hired the Labor Arts</p> <p>25 Society to conduct, and he said basically</p>	<p style="text-align: right;">Page 216</p> <p>1 WILSON</p> <p>2 Q. Okay. Previously you told me</p> <p>3 that Steve Leberstein told you that Ivy</p> <p>4 Rich told him that Terrence Cheng had said</p> <p>5 you were a thief, right?</p> <p>6 A. That's correct.</p> <p>7 Q. Now, are you talking about</p> <p>8 something different --</p> <p>9 A. Well --</p> <p>10 Q. -- with regard to Mr.</p> <p>11 Leberstein?</p> <p>12 A. Slightly different. That is</p> <p>13 Leberstein had ongoing meetings and</p> <p>14 conflicts with Ivy Rich over the</p> <p>15 historical representation of the Center</p> <p>16 For Worker Education. She was supposed</p> <p>17 to represent it, and Leberstein provided</p> <p>18 photos, and she didn't want to use my</p> <p>19 photo because Terrence Cheng said you</p> <p>20 can't -- he is a crook or he is a thief.</p> <p>21 You can't use Wilson's photograph.</p> <p>22 Q. So what Leberstein was telling</p> <p>23 you was based on what Ivy Rich had told</p> <p>24 him in 2012?</p> <p>25 A. That is one.</p>
<p style="text-align: right;">Page 215</p> <p>1 WILSON</p> <p>2 don't use Wilson's photo because he is a</p> <p>3 crook. He is a thief. This is what was</p> <p>4 reported to me contemporaneously at that</p> <p>5 time.</p> <p>6 Q. And who reported this to you?</p> <p>7 A. I heard it from actually a</p> <p>8 couple of sources. I heard it from</p> <p>9 Leberstein. I heard it from Erica</p> <p>10 Gaskins, and I heard it at that time from</p> <p>11 Don Tuminaro, and these were widely -- you</p> <p>12 know, that was going by -- his staff were</p> <p>13 going around telling everybody I am a</p> <p>14 crook. I am a thief, and that was in the</p> <p>15 New York Times article.</p> <p>16 Q. I asked you what Mr. Cheng said.</p> <p>17 A. So my understanding of what</p> <p>18 Cheng said is in one of the meetings that</p> <p>19 Leberstein, Gaskins, and Tumaniro had said</p> <p>20 that he mentioned my name specifically</p> <p>21 and, you know, criminality, criminal</p> <p>22 management, criminal acts. I got</p> <p>23 different stories from people who were</p> <p>24 there years back at the time that it</p> <p>25 happened.</p>	<p style="text-align: right;">Page 217</p> <p>1 WILSON</p> <p>2 Q. Yes?</p> <p>3 A. Yes. Number two, he made a</p> <p>4 similar comment to me when he had a</p> <p>5 meeting or a series of meetings, and it</p> <p>6 was in one of a series of meetings when he</p> <p>7 called me up afterwards and he --</p> <p>8 MR. JAMES KLEIN: A series of</p> <p>9 meetings with whom?</p> <p>10 A. I'm sorry. He had a series of</p> <p>11 meetings -- sorry. He had a series of</p> <p>12 meetings with Terrence Cheng with a small</p> <p>13 group of people, including these people,</p> <p>14 including Leberstein, Tumaniro, and</p> <p>15 Gaskins, and the meetings were around the</p> <p>16 Center for Worker Education and what was</p> <p>17 going to happen to it. And so Leberstein</p> <p>18 told me, and they all told me that Cheng</p> <p>19 lied to them about the program in the</p> <p>20 Center For Worker Education, and then they</p> <p>21 all in their own ways said that the</p> <p>22 program had been criminalized, and</p> <p>23 essentially Cheng was there to clean it</p> <p>24 up, and that was -- so there was</p> <p>25 criminalization of me but not simply me,</p>

55 (Pages 214 - 217)

<p style="text-align: right;">Page 218</p> <p>1 WILSON</p> <p>2 but me, the management of the Center For</p> <p>3 Worker Education, as well as students.</p> <p>4 It was like there was a criminal cloud</p> <p>5 over everybody.</p> <p>6 Q. Now, when exactly did</p> <p>7 Leberstein, Tumaniro, and Erica Gaskins</p> <p>8 tell you that Mr. Cheng had said that?</p> <p>9 A. I'll have to go back and</p> <p>10 double-check the dates. I am not</p> <p>11 absolutely positive on the dates.</p> <p>12 Q. What are you going to look at to</p> <p>13 double-check the dates?</p> <p>14 A. I actually -- I have to see if</p> <p>15 there is any documents pertaining to those</p> <p>16 meetings. I mean I don't know. I don't</p> <p>17 know exactly how I can double-check.</p> <p>18 Q. Do you know of any documents</p> <p>19 pertaining to these meetings sitting here</p> <p>20 today?</p> <p>21 A. Leberstein may have documents</p> <p>22 about those meetings.</p> <p>23 Q. He may or he does?</p> <p>24 A. I can't say for sure, but there</p> <p>25 is -- you know, he was at the meetings,</p>	<p style="text-align: right;">Page 220</p> <p>1 WILSON</p> <p>2 Q. Okay. You have read that to</p> <p>3 yourself?</p> <p>4 A. Yes.</p> <p>5 Q. What is that a reference to?</p> <p>6 A. That's a reference to in maybe</p> <p>7 2018 I went to the Graduate Center For</p> <p>8 Worker Education, and I photographed the</p> <p>9 pictorial representations of the</p> <p>10 institutional history of the Graduate</p> <p>11 Center For Worker Education to document</p> <p>12 how my historical contribution and role in</p> <p>13 the center had been treated as a result of</p> <p>14 the defamatory comments by Cheng.</p> <p>15 Q. So you're referring to videos</p> <p>16 that you took in 2018?</p> <p>17 A. Yes, of the work that was</p> <p>18 produced earlier by Ivy Rich.</p> <p>19 Q. And what is your understanding</p> <p>20 of what these videos show?</p> <p>21 A. The videos show, as I recall,</p> <p>22 two very large murals, pictorial and</p> <p>23 documentary representations of some of the</p> <p>24 highlights of the 30-year history or some</p> <p>25 span of time of the Center For Worker</p>
<p style="text-align: right;">Page 219</p> <p>1 WILSON</p> <p>2 and so -- and these were years ago, so he</p> <p>3 may have the agenda, the meetings, the</p> <p>4 notes.</p> <p>5 Q. Did you ever ask him for any</p> <p>6 such documents?</p> <p>7 A. I did ask him for those</p> <p>8 documents, yes.</p> <p>9 Q. And what did he say?</p> <p>10 A. He said he would look for them.</p> <p>11 Q. When did you ask him for those</p> <p>12 documents?</p> <p>13 A. This would have been a month or</p> <p>14 two ago.</p> <p>15 Q. And has he gotten back to you as</p> <p>16 to whether he found any documents?</p> <p>17 A. No.</p> <p>18 Q. I would like to direct your</p> <p>19 attention to paragraph 19 on page 6 of</p> <p>20 Exhibit 5.</p> <p>21 A. Paragraph 19, page 6.</p> <p>22 Q. Right. Read it to yourself,</p> <p>23 what is listed there, documentary video</p> <p>24 evidence. Do you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 221</p> <p>1 WILSON</p> <p>2 Education, and it showed many of the</p> <p>3 highlights and accolades, and it had a</p> <p>4 very large picture of a former director Ed</p> <p>5 Rogowski, whose picture was prominently</p> <p>6 displayed, and then -- but all of the</p> <p>7 accomplishments were accomplishments under</p> <p>8 my leadership, and I looked for my</p> <p>9 picture, and there was a tiny picture with</p> <p>10 my face with some other people, and it</p> <p>11 said I think just Joe Wilson, and -- and</p> <p>12 Leberstein told me he had to actually</p> <p>13 argue and fight for that. It was an</p> <p>14 ongoing tension between him and Ivy Rich</p> <p>15 because Ivy was told by Cheng not to</p> <p>16 include my picture, and Leberstein said</p> <p>17 no, you have to. This -- all of the</p> <p>18 things that you are talking about were</p> <p>19 created by Professor Wilson and under his</p> <p>20 leadership, and it is just not fair and</p> <p>21 not historically accurate. So I think as</p> <p>22 a compromise after argumentation I think</p> <p>23 that is what she kind of concluded that</p> <p>24 Cheng would allow her to do.</p> <p>25 Q. So it is your understanding that</p>

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<p style="text-align: right;">Page 222</p> <p>1 WILSON</p> <p>2 these videos that you personally took</p> <p>3 reflect your absence from the walls of the</p> <p>4 graduate center --</p> <p>5 A. My exclusion, conscious</p> <p>6 exclusion, yes.</p> <p>7 Q. And besides showing according to</p> <p>8 you your conscious exclusion on the walls</p> <p>9 of the Graduate Center For Worker</p> <p>10 Education, do you they show anything else?</p> <p>11 A. Yes, they showed my</p> <p>12 accomplishments but without attribute.</p> <p>13 Q. Okay. All right. I would like</p> <p>14 to go to page 8 of Exhibit 5.</p> <p>15 A. Page 8.</p> <p>16 Q. Under the heading Interrogatory</p> <p>17 6. Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And if you go to page</p> <p>20 7 --</p> <p>21 A. I don't have a page 7. I was on</p> <p>22 page 7.</p> <p>23 Q. You are on page 7 of Exhibit 4.</p> <p>24 Do you see Interrogatory 6 asks you to</p> <p>25 "Identify any economic injuries which</p>	<p style="text-align: right;">Page 224</p> <p>1 WILSON</p> <p>2 was available, and Professor Cunningham's</p> <p>3 professional colleague, who was the chair</p> <p>4 or was one of the directors of that</p> <p>5 institute, you know, he spoke to him or</p> <p>6 contacted him, but he looked to try to get</p> <p>7 me a position at this institute, and</p> <p>8 because of that controversy told me that</p> <p>9 he was just not able to pursue that to</p> <p>10 fruition because --</p> <p>11 Q. When was that?</p> <p>12 A. That would have been in 2014,</p> <p>13 2015.</p> <p>14 Q. The next person is David Addams.</p> <p>15 I believe you talked about that</p> <p>16 previously?</p> <p>17 A. Yes.</p> <p>18 Q. Do you have anything to add to</p> <p>19 what you testified previously about your</p> <p>20 attempts to get a position from Mr.</p> <p>21 Addams?</p> <p>22 A. Not at this moment.</p> <p>23 Q. The next person listed is Warren</p> <p>24 Whitlock, various positions and</p> <p>25 consultancy. Who is Mr. Whitlock?</p>
<p style="text-align: right;">Page 223</p> <p>1 WILSON</p> <p>2 plaintiff claims to have sustained as a</p> <p>3 result of the acts alleged in the</p> <p>4 complaint," and it continues, right?</p> <p>5 A. Yes.</p> <p>6 Q. And under Interrogatory 6 in</p> <p>7 Wilson Exhibit 5, you list a number of</p> <p>8 people under the sentence "Plaintiff was</p> <p>9 denied employment and following positions</p> <p>10 by the following persons." Do you see</p> <p>11 that, sir?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. One is Cunningham. That</p> <p>14 is a reference to Professor Cunningham in</p> <p>15 Africana studies at Brooklyn College,</p> <p>16 right?</p> <p>17 A. Well, Professor Cunningham, yes,</p> <p>18 was at Brooklyn College, but the</p> <p>19 opportunity was at Columbia University.</p> <p>20 Q. And what opportunity was that?</p> <p>21 A. There was a faculty position in</p> <p>22 the -- I am trying to remember the exact</p> <p>23 name. There was an African American</p> <p>24 Institute at Columbia University,</p> <p>25 and -- and it was a teaching position that</p>	<p style="text-align: right;">Page 225</p> <p>1 WILSON</p> <p>2 A. So Warren Whitlock is a</p> <p>3 management expert and familiar with EEO</p> <p>4 policies and affirmative action, and he</p> <p>5 has had high ranking positions in Columbia</p> <p>6 University, in the Department of Defense,</p> <p>7 and I -- actually the army. I think it</p> <p>8 was U.S. Army Department of Defense, and</p> <p>9 maybe one or two other institutions, and</p> <p>10 so, you know, I asked Whitlock to find a</p> <p>11 position or identify a position because he</p> <p>12 was highly ranked, and he said that it</p> <p>13 wouldn't withstand government review.</p> <p>14 Q. When did he tell you this?</p> <p>15 A. This would have been starting in</p> <p>16 2014, 2015.</p> <p>17 Q. Did he tell you why it wouldn't</p> <p>18 withstand government review?</p> <p>19 A. Yes, he said the government does</p> <p>20 ex tentative background checks and as soon</p> <p>21 as your name comes up in the New York</p> <p>22 Times you can't get a job.</p> <p>23 Q. Does Mr. Whitlock know that the</p> <p>24 neutral arbitrator in the arbitration</p> <p>25 between you and CUNY upheld your</p>

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1 WILSON
2 termination?
3 A. Well, he knows that there were
4 no criminal acts, and he was aware that I
5 was terminated.
6 Q. Does he know that a neutral
7 arbitrator upheld your termination?
8 A. I don't know what he knows.
9 Q. Who is Joe McDermott?
10 A. Joe McDermott was the director
11 of the Consortium For Worker Education.
12 Q. Where is that?
13 A. It is located in Manhattan and
14 New York City.
15 Q. And you spoke to Mr. McDermott
16 about employment opportunities?
17 A. Yes, I did.
18 Q. When?
19 A. Starting in probably 2013, '14,
20 '15.
21 Q. What did Mr. McDermott tell you?
22 A. Essentially that, you know, they
23 receive government funding, and it is just
24 not a good profile for them to have, you
25 know -- have me working in that type

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1 WILSON
2 of -- that type of environment because
3 they seek government funding, and they are
4 very closely monitored, and this is
5 just -- it would be too controversial and
6 so forth.
7 Q. You list Ronald Mason. Have
8 you spoken to Mr. Mason about teaching and
9 consulting positions?
10 A. Yes.
11 Q. When?
12 A. This would have been a year or
13 two ago.
14 Q. What did Mr. Mason tell you?
15 A. Initially he seemed favorably
16 disposed. Then on a subsequent
17 conversation he mentioned the New York
18 Times article, and I haven't heard from
19 him since.
20 Q. Was Mr. Cheng quoted in New York
21 Times article?
22 A. Not to my knowledge.
23 Q. Is Dr. Currah quoted in the
24 Times article?
25 A. Not to my knowledge.

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1 WILSON
2 Q. Is Ms. Isaacson quoted in the
3 Times article?
4 A. I think so.
5 Q. You think she is quoted?
6 A. She is referenced. Her name is
7 there.
8 Q. Is she quoted?
9 A. I would have to look at the
10 article again, but she is the source. It
11 listed a source for the defamatory
12 comments.
13 Q. Who is Jack Zevin?
14 A. Jack Zevin was a professor at
15 Queens College, I believe a professor of
16 education, and he was on the board of a
17 research organization, and -- so he is a
18 professor at Queens College and the name
19 of the research organization escapes me
20 know.
21 Q. And you spoke to Mr. Zevin about
22 consulting opportunities?
23 A. No, I actually had a consulting
24 opportunity with him in 2012 that -- that
25 ended.

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1 WILSON
2 Q. Did you work with Mr. Zevin in
3 connection with the Taft Institute?
4 A. The Taft Institute, yes.
5 Q. Okay. So was that consulting
6 relationship with the Taft Institute that
7 you are referring to here --
8 A. That's correct.
9 Q. -- that you lost in 2012?
10 A. That's right. Yes, 2012 I
11 believe it was. Yes, 2012.
12 Q. All right. Now, you referred
13 to Immanuel Ness, Professor Ness for
14 Publishing Imaging and Consulting. Do
15 you see that?
16 A. Yes, I do.
17 Q. Did you speak with Mr. Professor
18 Ness about employment opportunities?
19 A. Yes. Initially early on, yes,
20 in the -- in 2012 Professor Ness said he
21 would look for other opportunities for me,
22 although none materialized, and we
23 collaborated on a number of works,
24 and -- but at the time of the -- and in
25 fact he was a -- well, yes. I did speak

<p style="text-align: right;">Page 230</p> <p>1 WILSON</p> <p>2 with him about publishing, editing, and</p> <p>3 consulting, yes.</p> <p>4 Q. And what, if anything, has</p> <p>5 happened as a result of your speaking with</p> <p>6 Professor Ness about that?</p> <p>7 A. We no longer speak.</p> <p>8 Q. When did you last speak with</p> <p>9 him?</p> <p>10 A. Let's see. It would have been</p> <p>11 in early 2016.</p> <p>12 Q. Why don't you any longer speak,</p> <p>13 you and Professor Ness?</p> <p>14 A. I called him and reached out to</p> <p>15 him on numerous occasions, but he -- he</p> <p>16 never returned my calls.</p> <p>17 Q. When was the last time you spoke</p> <p>18 with Dominick Tumaniro?</p> <p>19 A. Maybe a month or so ago.</p> <p>20 Q. And what did you say to him and</p> <p>21 what did he say to you?</p> <p>22 A. So actually he told me that he</p> <p>23 spoke to you.</p> <p>24 Q. Right. And what else did he</p> <p>25 tell you?</p>	<p style="text-align: right;">Page 232</p> <p>1 WILSON</p> <p>2 who told him -- Henning told Tumaniro that</p> <p>3 I was stealing, and so -- so this was just</p> <p>4 the whole swirling thing, and then he also</p> <p>5 told me that he was terminated as a</p> <p>6 professor there in this whole environment</p> <p>7 where everybody had been criminalized</p> <p>8 including him and -- you know, the whole</p> <p>9 situation with Cheng at the helm,</p> <p>10 but -- so that is essentially what he told</p> <p>11 me.</p> <p>12 Q. Did Mr. Tumaniro tell you</p> <p>13 whether he had said whether Mr. Cheng had</p> <p>14 accused you of engaging in criminal</p> <p>15 activity?</p> <p>16 A. He told me he couldn't recall at</p> <p>17 that moment.</p> <p>18 Q. Have you had any subsequent</p> <p>19 conversations with him?</p> <p>20 A. No.</p> <p>21 Q. Now, let's go to Interrogatory</p> <p>22 14 on page 12 of Exhibit 15.</p> <p>23 A. Page -- what page was that?</p> <p>24 Q. Page 12.</p> <p>25 A. Okay. Page 12.</p>
<p style="text-align: right;">Page 231</p> <p>1 WILSON</p> <p>2 A. And he said that you tricked him</p> <p>3 into speaking to him. He told me that</p> <p>4 you called him and told him that he</p> <p>5 had -- that you had the right to speak</p> <p>6 with him, and then he engaged in</p> <p>7 conversation with you that he thought he</p> <p>8 had at that moment a legal obligation to</p> <p>9 speak with you because of your phraseology</p> <p>10 that you had the right, and he thought it</p> <p>11 was a legal -- like if you don't do this,</p> <p>12 you are in trouble. That is what he</p> <p>13 felt.</p> <p>14 Q. What else did he tell you about</p> <p>15 our conversation?</p> <p>16 A. He said you asked him mainly</p> <p>17 about Cheng, and he said he couldn't</p> <p>18 remember much about Cheng, but he</p> <p>19 remembered that the whole environment,</p> <p>20 everybody was criminalized. He was</p> <p>21 criminalized. The program was</p> <p>22 criminalized. He said, you know, upon</p> <p>23 reflection that essentially that -- oh,</p> <p>24 that he mentioned one person in</p> <p>25 particular, a labor leader, Bill Henning,</p>	<p style="text-align: right;">Page 233</p> <p>1 WILSON</p> <p>2 Q. And under interrogatory 14, and</p> <p>3 if you can go to interrogatory 14 on page</p> <p>4 9 of this document, Exhibit 4 --</p> <p>5 A. Page 9, Exhibit 4.</p> <p>6 Q. Yes.</p> <p>7 Q. Interrogatory 14 says,</p> <p>8 "Identify, one, the content of statements</p> <p>9 that Cheng allegedly 'repeated' to the</p> <p>10 Labor Arts Society as alleged in paragraph</p> <p>11 62 of the complaint."</p> <p>12 A. One moment, please. What are</p> <p>13 the two references on page 9, which</p> <p>14 number?</p> <p>15 Q. Interrogatory number 14.</p> <p>16 A. 14.</p> <p>17 Q. All right.</p> <p>18 A. Yes.</p> <p>19 Q. You can read it to yourself,</p> <p>20 right?</p> <p>21 A. Yes.</p> <p>22 Q. And one of the things</p> <p>23 Interrogatory 14 asks is the date on</p> <p>24 which -- and location at which Cheng</p> <p>25 allegedly repeated "Such statements." Do</p>

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<p style="text-align: right;">Page 234</p> <p>1 WILSON</p> <p>2 you see that?</p> <p>3 A. Yes.</p> <p>4 Q. Now, if you look at page 12 of</p> <p>5 Exhibit 5, the dates that are given in</p> <p>6 that response are 2013 and 2012, right?</p> <p>7 A. I actually thought that was room</p> <p>8 2013 meetings -- I thought that was room</p> <p>9 2013 at BC because what I was told</p> <p>10 subsequently was that they met, and there</p> <p>11 was some confusion about that, whether</p> <p>12 they were meeting at Brooklyn College or</p> <p>13 at the Graduate Center for Origination,</p> <p>14 and maybe they met both places. So --</p> <p>15 Q. So you think that is room 2013,</p> <p>16 not the year 2013? Is that what you are</p> <p>17 telling me?</p> <p>18 A. What I am telling you is I am</p> <p>19 not sure of the date they had those series</p> <p>20 of meetings, and I am not positive of the</p> <p>21 location because I have heard two</p> <p>22 different things. I am not sure.</p> <p>23 Q. When did the meetings take</p> <p>24 place?</p> <p>25 A. I am not sure.</p>	<p style="text-align: right;">Page 236</p> <p>1 WILSON</p> <p>2 A. This was in 2012, but he</p> <p>3 definitely -- but the administrative staff</p> <p>4 did report it to Cheng specifically Craig</p> <p>5 Wilson, the administrative staff, and I</p> <p>6 know Phillips. There may have been</p> <p>7 others as well.</p> <p>8 Q. Okay. If you go to page 14 of</p> <p>9 Exhibit 5, in the middle of the page there</p> <p>10 is a reference to a letter from president</p> <p>11 Harry S. Truman to Charles Wilson, right?</p> <p>12 A. Right.</p> <p>13 Q. And is that the letter that you</p> <p>14 said should have been described as one</p> <p>15 from President Roosevelt to Charles</p> <p>16 Wilson?</p> <p>17 A. Right.</p> <p>18 Q. So on two different documents</p> <p>19 you described the letter which you place a</p> <p>20 value of 150,000 as being from the wrong</p> <p>21 president, right?</p> <p>22 A. It was a president, but it was</p> <p>23 incorrect. It was Roosevelt and not</p> <p>24 Truman.</p> <p>25 Q. I know also in that same group of</p>
<p style="text-align: right;">Page 235</p> <p>1 WILSON</p> <p>2 Q. What years?</p> <p>3 A. It was either 2013 or 2014, but</p> <p>4 they would have to confirm. I am not</p> <p>5 sure. I am telling you I don't know for</p> <p>6 sure --</p> <p>7 Q. Okay.</p> <p>8 A. -- by the reference at the</p> <p>9 bottom that asked me about.</p> <p>10 Q. Yes.</p> <p>11 A. On interrogatory 14, the last</p> <p>12 question that date is correct in terms of</p> <p>13 as Max Azoula and Jose Ohyan and Immanuel</p> <p>14 Ness, so that -- that is correct.</p> <p>15 Q. You are referring to statements</p> <p>16 by "Cheng's administrative team", right?</p> <p>17 A. That's correct.</p> <p>18 Q. Not by Cheng himself?</p> <p>19 A. Well, more specifically by</p> <p>20 Currah to Ness in particular, specifically</p> <p>21 Currah to Ness.</p> <p>22 A. And I don't know if Ness had any</p> <p>23 conversations with Cheng at all. He may</p> <p>24 have.</p> <p>25 Q. This was in 2012 in any event?</p>	<p style="text-align: right;">Page 237</p> <p>1 WILSON</p> <p>2 listings you refer to Charles Wilson's</p> <p>3 oral history tapes.</p> <p>4 A. Yes.</p> <p>5 Q. Where were those oral history</p> <p>6 tapes kept?</p> <p>7 A. Those were kept at Brooklyn</p> <p>8 College at my political science office.</p> <p>9 Q. Where in Brooklyn College at</p> <p>10 your political science office?</p> <p>11 A. In one of my file cabinets.</p> <p>12 Q. And it is your testimony that</p> <p>13 this is the only copy of those oral</p> <p>14 history tapes?</p> <p>15 A. There is no other copy.</p> <p>16 Q. Your father was a professor?</p> <p>17 A. No.</p> <p>18 Q. What was he?</p> <p>19 A. Well, that is a complicated</p> <p>20 question. He wasn't simply one thing, so</p> <p>21 --</p> <p>22 Q. Tell me.</p> <p>23 A. Well, my father was a political</p> <p>24 activist. He was a trade union leader.</p> <p>25 He was a journalist. He ran for senate in</p>

60 (Pages 234 - 237)

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1 WILSON
2 the State of Illinois. He was a leader
3 in the American Communist Party on the
4 Central Committee.
5 Q. Okay. Thank you.
6 A. What time do you have?
7 Q. 4.
8 A. I am just going to walk around
9 the room for a second and stretch.
10 MR. JAMES KLEIN: Can we take
11 another ten-minute break and then go to
12 the end.
13 MR. MARK KLEIN: That's fine.
14 (Recess taken.)
15 (Wilson Exhibit 7 marked for
16 identification.)
17 BY MR. MARK KLEIN:
18 Q. Dr. Wilson, I show you what has
19 been marked as Wilson Exhibit 7. Please
20 take a moment to review the document
21 generally and tell me when you have done
22 so, and I'll represent to you that I have
23 inserted exhibit tabs and bound this
24 document, but, otherwise, it is what your
25 counsel served on me.

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1 WILSON
2 MR. JAMES KLEIN: The copy you
3 gave me has -- did you give me your copy?
4 MR. MARK KLEIN: Yes. Thank
5 you.
6 Q. My question to you is have you
7 seen Exhibit 7 before, sir?
8 A. Exhibit 7?
9 Q. Yes, this is Exhibit 7/?
10 A. Because it says Exhibit 1, and
11 there is no 7. This is Exhibit 7.
12 Okay. I've seen this.
13 Q. And if you look at the last page
14 before Exhibit 1 of this document. That's
15 your verification?
16 A. My signature. Yes.
17 Q. Right?
18 A. Yes.
19 Q. And you signed that on December
20 20, 2018?
21 A. Correct.
22 Q. And you declared under penalty
23 of perjury that the facts stated in
24 Plaintiff's Supplemental Responses to
25 Certain of Defendants' First Set of

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1 WILSON
2 Interrogatories were true to the best of
3 your knowledge, information, and belief,
4 right?
5 A. That's correct.
6 Q. Now, I am going to ask you a lot
7 more about this document tomorrow, but I
8 just want to ask you about Exhibit 5 to
9 this document, which is a document that is
10 1 through 52, right? It is 52 pages long?
11 A. Yes.
12 Q. This document is titled "Dr.
13 Joseph Wilson's Professional Production
14 and Seized Materials."
15 A. Yes.
16 Q. That is correct?
17 A. That's correct. That is the
18 title.
19 Q. Did you prepare this document
20 which is Exhibit 5?
21 A. Yes, I did.
22 Q. Did anybody assist you in
23 preparing this document?
24 A. No.
25 Q. How did you go about preparing

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1 WILSON
2 this document?
3 A. By focusing on my research, my
4 work, my starting with my curriculum vitae
5 and then by reflecting carefully to the
6 extent possible to try to create in the
7 absence of a lot of documents the things
8 that I did over the years.
9 Q. Did you refer to any documents
10 in in preparing this Exhibit 5?
11 A. Yes, I did.
12 Q. What documents did you refer to?
13 A. I referred to Tearing Down the
14 Color Bar.
15 Q. That is one of your books?
16 A. Yes.
17 Q. Anything else?
18 A. Yes. I referred to Black
19 Labor -- Black Labor and another book. I
20 refer to several of my books.
21 Q. Anything else that you refer to
22 besides your books?
23 A. Yes, I -- I went online to look
24 up some of the events at the worker
25 education center that I directed. For

<p style="text-align: right;">Page 242</p> <p>1 WILSON</p> <p>2 example, I looked up black women in the</p> <p>3 radicle -- Black Women in the Radicle</p> <p>4 Tradition in order to see -- to refresh my</p> <p>5 memory to see who participated</p> <p>6 and -- so -- and I looked at the -- there</p> <p>7 is a publication called Dissertation</p> <p>8 Abstracts, which lists my doctoral thesis.</p> <p>9 Then I actually made some references to my</p> <p>10 archival collection. I went to the --</p> <p>11 you know, scrolling online to look at</p> <p>12 Black Workers and my documents, and some</p> <p>13 of them are -- my archival work/, some of</p> <p>14 it is cited online and then --</p> <p>15 Q. You are talking about your</p> <p>16 archival work at the Schomburg Center?</p> <p>17 A. Yes. My archival work at the</p> <p>18 Schomburg Center, and let's see. I</p> <p>19 mentioned that I looked online at the</p> <p>20 International Encyclopedia of Protest and</p> <p>21 Revolution. Then of course I had to, you</p> <p>22 know, reconstruct and kind of</p> <p>23 re -- rethink some of the collections,</p> <p>24 and so that's -- that's pretty much what I</p> <p>25 could think of off the top of my head.</p>	<p style="text-align: right;">Page 244</p> <p>1 WILSON</p> <p>2 Q. So is that the estimate of the</p> <p>3 amount of time it took you to write</p> <p>4 Tearing Down the Color Bar or is that an</p> <p>5 estimate of the amount of time that it</p> <p>6 would take to reproduce the materials that</p> <p>7 you say were seized and not returned?</p> <p>8 A. That would have been a</p> <p>9 combination of research and writing over a</p> <p>10 period of five years.</p> <p>11 Q. So is this the amount of time</p> <p>12 that it would take you to reproduce what</p> <p>13 was lost?</p> <p>14 A. It might take longer and -- so,</p> <p>15 for example, for Volume 2, it could take</p> <p>16 approximately five years to do a -- or to</p> <p>17 recreate this volume approximately.</p> <p>18 So --</p> <p>19 Q. Again, I ask you, sir, is that</p> <p>20 600 days the amount of time you estimate</p> <p>21 it would take to reproduce what was lost</p> <p>22 when these materials that you list here</p> <p>23 were "Seized and not returned"?</p> <p>24 A. Yes. So from --</p> <p>25 Q. Yes or no.</p>
<p style="text-align: right;">Page 243</p> <p>1 WILSON</p> <p>2 Q. As I said, I am going to ask you</p> <p>3 a lot more about this tomorrow, but I just</p> <p>4 want -- if you go to page 3 of 52.</p> <p>5 A. Page 3.</p> <p>6 Q. Under the heading "Tearing Down</p> <p>7 the Color Bar", you have a list of quote</p> <p>8 "Materials seized and not returned." Do</p> <p>9 you see that?</p> <p>10 A. Yes, I do.</p> <p>11 Q. And then you say "Statement</p> <p>12 labor times" and you say 600 days over</p> <p>13 five years?</p> <p>14 A. Right.</p> <p>15 Q. That is 600 days to do what?</p> <p>16 A. Well, that is to -- to do the</p> <p>17 historical research, the documentation,</p> <p>18 the annotation, the writing of the</p> <p>19 manuscript, and then editing of the</p> <p>20 manuscript, and, you know, finding graphic</p> <p>21 illustrations, and, you know, looking at</p> <p>22 the various letters, correspondence, my</p> <p>23 notes. So that -- that took</p> <p>24 approximately that amount of time as a</p> <p>25 conservative estimate, but yes.</p>	<p style="text-align: right;">Page 245</p> <p>1 WILSON</p> <p>2 A. Yes. Yes.</p> <p>3 Q. Okay. All right. We will</p> <p>4 come back to that tomorrow.</p> <p>5 A. Uh-huh.</p> <p>6 MR. MARK KLEIN: I am going to</p> <p>7 ask the reporter to mark as Wilson Exhibit</p> <p>8 8 a document bearing the stamps --</p> <p>9 A. So actually let me --</p> <p>10 Q. Wait.</p> <p>11 A. Let me clarify one point.</p> <p>12 So just for your edification,</p> <p>13 research is done in stages, so there was a</p> <p>14 preliminary stage that was required that</p> <p>15 took a separate amount of time and</p> <p>16 separate work, and without the preliminary</p> <p>17 stage I couldn't have done this. So we</p> <p>18 could talk about that tomorrow, but this</p> <p>19 wouldn't have been everything related --</p> <p>20 This was the writing and the production</p> <p>21 and research and footnoting and writing</p> <p>22 out the manuscript, but there was a series</p> <p>23 of presteps before I could get to the</p> <p>24 actual writing of the manuscript. So</p> <p>25 that's -- I just wanted to clarify that.</p>

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<p style="text-align: right;">Page 246</p> <p>1 WILSON</p> <p>2 Q. Okay. But again that 600 hours</p> <p>3 is the amount of time it would take to</p> <p>4 recreate all those materials?</p> <p>5 A. Not 600 hours. I didn't say</p> <p>6 hours.</p> <p>7 Q. 600 --</p> <p>8 A. Days.</p> <p>9 Q. 600 days to recreate what was</p> <p>10 lost when those materials were "Seized and</p> <p>11 not returned"?</p> <p>12 A. Approximately. Yes.</p> <p>13 Q. Okay.</p> <p>14 MR. MARK KLEIN: I am going to</p> <p>15 ask the reporter to mark as Wilson Exhibit</p> <p>16 8 a document bearing stamps -- well, I see</p> <p>17 that in the copying the Bates stamps got</p> <p>18 removed, but on the original I have the</p> <p>19 documents were Bates stamped DEF 000571</p> <p>20 through 590.</p> <p>21 (Wilson Exhibit 8 marked for</p> <p>22 identification.)</p> <p>23 (Document handed to witness.)</p> <p>24 Q. Dr. Wilson, I hand you what has</p> <p>25 been marked as Exhibit 8, and my question,</p>	<p style="text-align: right;">Page 248</p> <p>1 WILSON</p> <p>2 understanding is that research is an</p> <p>3 expectation of employment, and that is not</p> <p>4 a reportable activity.</p> <p>5 Q. If you were being paid in</p> <p>6 addition to your salary for research, were</p> <p>7 you required to report that on a multiple</p> <p>8 position report?</p> <p>9 A. I don't think so.</p> <p>10 Q. And what is that based on?</p> <p>11 A. That research -- well, that</p> <p>12 research is an expectation whether it is</p> <p>13 paid or unpaid because, for example,</p> <p>14 I -- you publish a book, and you get</p> <p>15 royalties. They don't ask you for a</p> <p>16 royalty report or publication report</p> <p>17 like -- in terms of your remuneration. So</p> <p>18 my understanding after all of these years</p> <p>19 on the faculty is no, that is not a</p> <p>20 requirement.</p> <p>21 MR. JAMES KLEIN: Well, you</p> <p>22 know, is there a time element? I mean</p> <p>23 there is no -- I am not certain that what</p> <p>24 might be standard practice today regarding</p> <p>25 multiple position reports is the same</p>
<p style="text-align: right;">Page 247</p> <p>1 WILSON</p> <p>2 sir, is whether you have seen these pages</p> <p>3 before?</p> <p>4 A. Yes.</p> <p>5 Q. And what are they?</p> <p>6 A. This is called the Multiple</p> <p>7 Position Form, Brooklyn College.</p> <p>8 Q. And these are multiple position</p> <p>9 reports that you filled out and signed at</p> <p>10 various times while you were employed at</p> <p>11 Brooklyn College; is that right?</p> <p>12 A. That's correct.</p> <p>13 Q. And do you recall that this was</p> <p>14 an exhibit at the arbitration where you</p> <p>15 were represented by Pete Zwiebach?</p> <p>16 A. I do.</p> <p>17 Q. And what is your understanding,</p> <p>18 if any, of when you're required -- when</p> <p>19 you were required to fill out a multiple</p> <p>20 position report while you were employed at</p> <p>21 Brooklyn College?</p> <p>22 A. My understanding is in the first</p> <p>23 place that research is excluded from</p> <p>24 multiple position reporting, as I wasn't</p> <p>25 being paid, but even if I was my</p>	<p style="text-align: right;">Page 249</p> <p>1 WILSON</p> <p>2 practice --</p> <p>3 MR. MARK KLEIN: I am not</p> <p>4 asking --</p> <p>5 MR. JAMES KLEIN: You are</p> <p>6 asking if something was required. Was it</p> <p>7 required from 1990 when he was a professor</p> <p>8 was it required in 1992 when he was a</p> <p>9 professor? Was it required in 1997 when</p> <p>10 he was professor? I mean policies change</p> <p>11 over time, and they change depending on</p> <p>12 the context of what position. So an open</p> <p>13 ended question of what is required is sort</p> <p>14 of an unanswerable question.</p> <p>15 MR. MARK KLEIN: I ask the</p> <p>16 reporter to mark as Wilson Exhibit 9</p> <p>17 documents bearing Bates stamps DEF 196</p> <p>18 through 210.</p> <p>19 (Wilson Exhibit 9 marked for</p> <p>20 identification.)</p> <p>21 (Document handed to witness.)</p> <p>22 Q. Dr. Wilson, I show you what has</p> <p>23 been marked as Wilson Exhibit 9. Please</p> <p>24 take a moment to review that. I am not</p> <p>25 going to ask you about specifics at least</p>

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1 WILSON
2 not now, but tell me whether you have seen
3 this before?
4 A. I don't recall seeing this.
5 Q. Do you have any recollection of
6 whether this was Exhibit 107 A at the
7 arbitration at which you were represented
8 by Pete Zwiebach?
9 A. I don't remember, but I see the
10 marking on the top.
11 Q. Do you recall seeing multiple
12 position policies for Brooklyn College
13 effective in the 2010 to 2011 time period?
14 A. I do.
15 Q. Do you recognize that these are
16 Brooklyn College's multiple position
17 policies during that time period?
18 A. I would have to look at it more
19 carefully because they have changed over
20 several occasions from when I started to
21 this period, so I would have to read it
22 again.
23 Q. Well, if you look at the fifth
24 page of the document.
25 A. Of which document?

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1 WILSON
2 Q. The one you are looking at.
3 A. There is no page numbers on
4 this.
5 Q. I know. So go to the fifth
6 page, please. Do you see at the bottom
7 right-hand portion of the page it says
8 "Approved by CUNY Board of Trustees on
9 February 26, 2017"?
10 A. Yes, I see that.
11 Q. Does that refresh your
12 recollection that the -- that this policy
13 was in effect while you worked at Brooklyn
14 College?
15 A. Well, apparently it was. I
16 can't say it refreshes my recollection.
17 Q. And if you go to the page that
18 has a Bates stamp DEF 204.
19 A. Yes.
20 Q. Do you see that it says page 1
21 of 2 at the bottom revised 4/2011? Do you
22 see that?
23 A. Yes. Okay.
24 Q. Revised April, 4/2011, right?
25 A. Yes.

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1 WILSON
2 Q. And if you go to page 4 under
3 the heading City University of New York
4 Multiple Position Policy Manual.
5 A. Yes.
6 Q. Also at policy 5.14 multiple
7 positions, and the document says it was
8 retrieved from the website on April 5,
9 2011. Do see that, sir?
10 A. I do.
11 Q. Okay. Now, does this refresh
12 your recollection that these were the
13 Multiple Position Policy for Brooklyn
14 College during the time period 2009 to
15 2012 when you were employed at Brooklyn
16 College?
17 A. I would have to look at it more
18 carefully, but I guess that is -- I guess
19 that is what it was.
20 Q. Do you recall seeing the
21 Multiple Position Policy for Brooklyn
22 College while you were a professor there?
23 A. Not like this. Not in this
24 form, no.
25 Q. Is it your testimony that this

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1 WILSON
2 is not the Multiple Position Policy that
3 was in effect from 2009 to 2012?
4 A. That is not my testimony. My
5 testimony is I didn't see it in this
6 format. We were given a -- this, not the
7 policy. This is what we were given, the
8 multi position form, not the multiple
9 position manual.
10 Q. So is it your testimony that you
11 didn't look at the Multiple Position
12 Policy as set forth in the Brooklyn
13 College manual --
14 A. Yes --
15 Q. -- while you were a professor
16 there?
17 A. Correct.
18 Q. And you didn't have access to
19 it. Is that your testimony?
20 A. I didn't say that I didn't have
21 access. I was unaware of it.
22 Q. How long were you a professor at
23 Brooklyn College?
24 A. About 30 years.
25 Q. And it is your testimony that

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1 WILSON
2 you weren't aware of the Multiple Position
3 Policy?
4 A. This was the only Multiple
5 Position Form I ever received, and this
6 wasn't even -- this is evolved, but yes, I
7 never received a policy.
8 MR. MARK KLEIN: I am going to
9 ask that the reporter mark as Wilson
10 Exhibit 10 --
11 A. That I can remember.
12 Q. Okay.
13 MR. MARK KLEIN: -- Wilson 10 a
14 document bearing the Bates stamp DEF
15 000211 through 216.
16 (Wilson Exhibit 10 marked for
17 identification.)
18 (Document handed to witness.)
19 Q. Dr. Wilson, I show you what has
20 been marked as Wilson Exhibit 10. Please
21 take a moment to review the document.
22 (Pause.)
23 Q. Tell me when you have done so.
24 A. Yes.
25 Q. These are a series of e-mails

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1 WILSON
2 from James Eaton at Brooklyn College to
3 you; is that correct?
4 A. Correct.
5 Q. And they run from the period of
6 October of 2008 through February of 2012,
7 right?
8 A. Correct.
9 Q. And this was an exhibit at your
10 arbitration at which you were represented
11 by Mr. Zwiebach, correct?
12 A. Correct.
13 Q. Do you recall seeing this
14 exhibit during the course of the
15 arbitration?
16 A. No, not the specific exhibit.
17 Q. Do you recall receiving any of
18 these e-mails from James Eaton?
19 A. I received -- I recall receiving
20 e-mails about reminders for multiple
21 positions, and those e-mails were always
22 associated with a hardcopy that we filled
23 out, so I -- that is my recollection.
24 Q. Do you recall receiving any of
25 the e-mails that have been marked as

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1 WILSON
2 Exhibit 10?
3 A. Yes. No, not the specific
4 e-mails. I know it was the policy to
5 remind faculty, and I was very diligent
6 about filling out my Multiple Position
7 Form. That is what I did.
8 Q. Well, let's look at the first
9 page of Exhibit 10. It is an e-mail from
10 James Eaton to you dated October 14 of
11 2008, right?
12 A. Right.
13 Q. And the first sentence of the
14 e-mail says after "Dear Professor Wilson,
15 we have not received your completed
16 multiple" -- let me try again.
17 "We have not received your
18 completed multiple position report for
19 this semester." Correct?
20 A. That's correct.
21 Q. And so he was reminding you that
22 you hadn't submitted your multiple
23 position report for that semester yet,
24 right?
25 A. That is not right.

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1 WILSON
2 Q. What is inaccurate about this?
3 A. I happen to remember that I
4 submitted it three times, and the
5 departmental secretary at that time lost
6 it three times because we don't submit it
7 to Eaton. We submit it to our
8 departmental secretaries. At first we
9 discuss it with the chair, and then we
10 submit it to the secretary, and I remember
11 on a couple of occasions -- her name was
12 Maria Corazone. I am not sure of the
13 precise spelling of her name. Maybe it is
14 Corazone, and I remember being flummoxed
15 not just me but other people that they
16 repeatedly lost our Multiple Position
17 Forms. So --
18 Q. If you look at Exhibit 10, there
19 are reminders that you hadn't submitted
20 your form for each of 2008, 2009, 2010,
21 2011, and 2012, correct?
22 A. Right.
23 Q. And is it your testimony that
24 the departmental secretary lost the multi
25 position report that you had prepared and

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1 WILSON
2 submitted each and every time that you had
3 gotten a reminder?
4 A. At least a couple of times. Not
5 necessarily each and every time.
6 Q. Look at just the first page of
7 Exhibit 10. You will see in the middle of
8 Mr. Eaton's e-mail he says, "The form, the
9 instructions, and the related policies are
10 available via the links below." Do you
11 see that?
12 A. Yes.
13 Q. So he was telling you exactly
14 where you could go on the website to find
15 the Multiple Position Form and the
16 instructions and the policies, correct?
17 A. That's correct.
18 Q. And it is your testimony you
19 never looked at the instructions and the
20 policies?
21 A. Well, I only really looked at
22 the Multiple Position Form. My
23 understanding was this spelled out the
24 specific policies. This --
25 Q. Could you answer my question,

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1 WILSON
2 sir. Is it your testimony you never
3 looked at the instructions and the
4 policies relating to the Multiple Position
5 Form while you were a professor at
6 Brooklyn College for 30 years?
7 A. That is not correct. What I
8 said was I looked at instructions and
9 policies on the multiple position form
10 itself. I didn't look at a manual.
11 Correct.
12 Q. Now, is Exhibit 8 a copy of all
13 the multiple position forms you submitted
14 between the spring of 2005 and the fall of
15 2011?
16 A. I don't think so.
17 Q. Do you believe you submitted
18 multiple position forms in addition to the
19 ones that are collected as part of Exhibit
20 8?
21 A. I haven't had a chance to see if
22 every year that you are mentioning, you
23 know -- I haven't looked at this really,
24 so I don't know precisely.
25 Q. Take a moment and look at it.

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1 WILSON
2 A. So what were the years you said
3 now?
4 Q. Let's just focus on from 2009 to
5 2011. So if you will go to DEF 000583 to
6 the end.
7 MR. JAMES KLEIN: My copy isn't
8 Bates stamped, so I don't know where you
9 are.
10 MR. MARK KLEIN: I apologize
11 for that. As I said, in the copying the
12 Bates stamps --
13 MR. JAMES KLEIN: Is his Bates
14 stamped?
15 A. I don't see --
16 MR. JAMES KLEIN: Does it have a
17 number on it? No, it doesn't.
18 MR. MARK KLEIN: Okay. That's
19 unfortunate.
20 Q. If you go to the eighth page
21 from the end --
22 MR. JAMES KLEIN: From the end?
23 MR. MARK KLEIN: From the back.
24 Q. So the eighth page from the back
25 is the multiple position report from fall

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1 WILSON
2 of 2009; correct?
3 A. That's correct.
4 Q. And that is your signatures at
5 about the middle of the page?
6 A. At the bottom.
7 Q. And the date next to your
8 signature is September 9, 2009?
9 A. That's right.
10 Q. Now, after that there is a
11 multiple position report for the fall of
12 2010, correct?
13 A. You mean on the next page?
14 Q. No, two pages.
15 A. Yes.
16 Q. And if you go four pages more
17 there is a multiple position report for
18 the fall of 2011, correct?
19 A. The fall -- right.
20 Q. So the one in the fall of 2011
21 you signed electronically as indicated at
22 the bottom of the page, correct?
23 A. Right.
24 Q. So included here in this exhibit
25 were three multiple position reports that

<p style="text-align: right;">Page 262</p> <p>1 WILSON</p> <p>2 you submitted for the fall of 2009, the</p> <p>3 fall 2010, and the fall of 2011, correct?</p> <p>4 A. Correct.</p> <p>5 Q. Are you aware of any other</p> <p>6 multiple position forms that you submitted</p> <p>7 during the time period fall of 2009</p> <p>8 through fall of 2011?</p> <p>9 A. As I said, there were multiple</p> <p>10 position forms that I submitted that I had</p> <p>11 to resubmit on numerous occasions because</p> <p>12 the secretary lost them. So yes, there</p> <p>13 were other multiple position forms that I</p> <p>14 submitted to the department that weren't</p> <p>15 submitted to the provost.</p> <p>16 Q. And how do you know that?</p> <p>17 A. Because the chair told me at</p> <p>18 that time.</p> <p>19 Q. Who was the chair?</p> <p>20 A. Sally Bermanson.</p> <p>21 Q. Did you keep a copy of multiple</p> <p>22 position reports that you filled out?</p> <p>23 A. Yes, I kept copies.</p> <p>24 Q. Where did you keep those copies?</p> <p>25 A. In my office in Brooklyn</p>	<p style="text-align: right;">Page 264</p> <p>1 WILSON</p> <p>2 Teachers Project?</p> <p>3 A. That was a project to recruit</p> <p>4 and support and provide scholarships and</p> <p>5 mentorship to African American men to</p> <p>6 encourage their participation in teaching</p> <p>7 at Brooklyn College. Essentially</p> <p>8 under -- making sure that undergraduate</p> <p>9 men -- I am actually trying to remember.</p> <p>10 I think it was both undergraduate and</p> <p>11 graduate. I would have to refresh my</p> <p>12 recollection on that, but we worked with</p> <p>13 African American men to maintain their</p> <p>14 GPAs, to give them scholarships to make</p> <p>15 sure that they would enter the teaching</p> <p>16 profession.</p> <p>17 Q. And what did you personally</p> <p>18 do --</p> <p>19 MR. MARK KLEIN: Withdrawn.</p> <p>20 Q. How long did you work as a</p> <p>21 coprincipal investigator with respect to</p> <p>22 the Urban Community Teachers Project?</p> <p>23 A. Approximately a couple of years.</p> <p>24 Q. What years?</p> <p>25 A. Maybe 2009 through 2011.</p>
<p style="text-align: right;">Page 263</p> <p>1 WILSON</p> <p>2 College.</p> <p>3 Q. And those multiple position</p> <p>4 reports are among the documents that you</p> <p>5 didn't get back. Is that what your</p> <p>6 testimony is?</p> <p>7 A. That's correct.</p> <p>8 Q. Are you familiar with something</p> <p>9 called the Deutsche Bank Foundation?</p> <p>10 A. Yes.</p> <p>11 Q. What was the Deutsche Bank</p> <p>12 Foundation?</p> <p>13 A. It was a foundation that</p> <p>14 provided funding for one of the programs</p> <p>15 that I was a principal investigator on,</p> <p>16 coprincipal investigator.</p> <p>17 Q. And what is a principal</p> <p>18 investigator?</p> <p>19 A. One who is leading an aspect or</p> <p>20 a research project.</p> <p>21 Q. And what was that project on</p> <p>22 which you were a coprincipal investigator?</p> <p>23 A. I believe that was the Urban</p> <p>24 Community Teachers Program or project.</p> <p>25 Q. And what was the Urban Community</p>	<p style="text-align: right;">Page 265</p> <p>1 WILSON</p> <p>2 Q. Now, you just testified that the</p> <p>3 Deutsche Bank Foundation was a donor in</p> <p>4 connection with that project?</p> <p>5 A. That's correct.</p> <p>6 Q. And was there -- are you</p> <p>7 familiar with something called the Schott,</p> <p>8 S-C-H-O-T-T, Foundation?</p> <p>9 A. Schott Foundation.</p> <p>10 Q. And was the Schott Foundation</p> <p>11 also a donor in connection with the Urban</p> <p>12 Community Teacher Project?</p> <p>13 A. Yes.</p> <p>14 Q. And who is the other principal</p> <p>15 investigator besides yourself?</p> <p>16 A. Noel Anderson, Professor</p> <p>17 Anderson.</p> <p>18 Q. Now, did you or anyone on your</p> <p>19 behalf make requests for payments from the</p> <p>20 Schott Foundation in connection with</p> <p>21 administrative support that you did for</p> <p>22 the Urban Community Teacher Project?</p> <p>23 A. Not from the Schott Foundation,</p> <p>24 from the Brooklyn College Foundation.</p> <p>25 Q. Okay. Was the account named</p>

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<p style="text-align: right;">Page 266</p> <p>1 WILSON</p> <p>2 the Schott Foundation?</p> <p>3 A. I don't recall the name of the</p> <p>4 account.</p> <p>5 Q. The funds were housed at the</p> <p>6 Brooklyn College Foundation?</p> <p>7 A. That is my understanding.</p> <p>8 Q. So you or someone on your behalf</p> <p>9 made a request for payment from the</p> <p>10 Brooklyn College Foundation for</p> <p>11 administrative support you provided for</p> <p>12 Urban Community Teachers Project?</p> <p>13 A. No, not simply. The Brooklyn</p> <p>14 College Foundation as well as college</p> <p>15 administration and the School of Education</p> <p>16 reviewed the application, and I think</p> <p>17 for -- so we didn't apply as individuals.</p> <p>18 So everything was reviewed by the college</p> <p>19 and by the Brooklyn College Foundation as</p> <p>20 well as by human resources, and everything</p> <p>21 was approved including whatever terms of</p> <p>22 payment that we were supposed to receive</p> <p>23 was approved in advance of us receiving</p> <p>24 any funding.</p> <p>25 Q. Okay. But a request was made</p>	<p style="text-align: right;">Page 268</p> <p>1 WILSON</p> <p>2 Q. Actually it is a series of</p> <p>3 payment requests, is it not?</p> <p>4 A. Yes, it is a series.</p> <p>5 Q. And these requests were requests</p> <p>6 that were made for payment to you for</p> <p>7 administrative support for the UCT</p> <p>8 program, correct?</p> <p>9 A. That's correct.</p> <p>10 Q. And this document was -- you saw</p> <p>11 this during the course of your arbitration</p> <p>12 in which you were represented by Mr.</p> <p>13 Zwiebach, correct?</p> <p>14 A. Yes.</p> <p>15 Q. This was -- it is written at the</p> <p>16 top CUNY 29, Exhibit 29, right?</p> <p>17 A. Correct.</p> <p>18 Q. Now, as a result of these</p> <p>19 payment requests you received a payment of</p> <p>20 \$5,000 in June of 2010, correct?</p> <p>21 A. That's correct.</p> <p>22 Q. And you received two 5,000</p> <p>23 dollar payments in --</p> <p>24 MR. MARK KLEIN: Withdrawn.</p> <p>25 Q. And you received a payment of</p>
<p style="text-align: right;">Page 267</p> <p>1 WILSON</p> <p>2 for a check payable to you from the</p> <p>3 Brooklyn College Foundation the purpose</p> <p>4 for which was to pay you for</p> <p>5 administrative support you provided for</p> <p>6 the Urban Community Teachers Program; is</p> <p>7 that right?</p> <p>8 A. That's correct.</p> <p>9 MR. MARK KLEIN: I am going to</p> <p>10 ask the reporter to mark as Exhibit 11 a</p> <p>11 document bearing Bates Stamps DEF 00546</p> <p>12 through 5553.</p> <p>13 (Wilson Exhibit 11 marked for</p> <p>14 identification.)</p> <p>15 (Document handed to witness.)</p> <p>16 Q. Dr. Wilson, I show you what has</p> <p>17 been marked as Exhibit 11 in this</p> <p>18 deposition. If you could look at that,</p> <p>19 please, sir.</p> <p>20 A. Uh-huh.</p> <p>21 Q. Can you tell me what Exhibit 11</p> <p>22 is?</p> <p>23 A. This is a payment request</p> <p>24 from -- to the account Schott Foundation</p> <p>25 and a check payable to Joseph Wilson.</p>	<p style="text-align: right;">Page 269</p> <p>1 WILSON</p> <p>2 5,000 in August of 2010, right?</p> <p>3 A. That's correct.</p> <p>4 Q. And another payment of 5,000 in</p> <p>5 October of 2010, right?</p> <p>6 A. That's correct.</p> <p>7 MR. MARK KLEIN: I ask that the</p> <p>8 reporter mark as Wilson 12 a document</p> <p>9 bearing Bates stamps DEF 00546 through</p> <p>10 553.</p> <p>11 (Wilson Exhibit 12 marked for</p> <p>12 identification.)</p> <p>13 (Document handed to witness.)</p> <p>14 Q. Dr. Wilson, I show you what has</p> <p>15 been marked as Exhibit 12. Please take a</p> <p>16 moment to review that document. My first</p> <p>17 question is whether you have seen it</p> <p>18 before?</p> <p>19 A. I couldn't recall seeing it, but</p> <p>20 I see CUNY 30.</p> <p>21 Q. Do you recall whether this was</p> <p>22 an exhibit at the arbitration in which you</p> <p>23 were represented by Mr. Zwiebach?</p> <p>24 A. I don't recall specifically, no.</p> <p>25 MR. JAMES KLEIN: Are these</p>

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<p style="text-align: right;">Page 270</p> <p>1 WILSON</p> <p>2 numbers in the upper right-hand corner the</p> <p>3 exhibit numbers from the arbitration?</p> <p>4 MR. MARK KLEIN: Yes, they</p> <p>5 didn't have tabs. They apparently just</p> <p>6 wrote numbers.</p> <p>7 A. Let me -- I have to stop you</p> <p>8 because I remember specifically indicating</p> <p>9 Urban Community Teachers on my Multiple</p> <p>10 Position Form and BMI, and I don't see any</p> <p>11 reference to those, so these documents are</p> <p>12 not complete. I absolutely mentioned</p> <p>13 Urban Community Teachers and the amount of</p> <p>14 payment and so forth.</p> <p>15 Q. Did you disclose the payment you</p> <p>16 received from the -- for the</p> <p>17 administrative work you did in the amount</p> <p>18 of \$5,000 on your Multiple Position Form</p> <p>19 with respect to the payment you got in the</p> <p>20 spring of 2010?</p> <p>21 A. That's my recollection, yes.</p> <p>22 Q. It is your testimony that you</p> <p>23 disclosed on your multiple position report</p> <p>24 for the spring of 2010 payment of \$5,000?</p> <p>25 A. My point is I see nothing here</p>	<p style="text-align: right;">Page 272</p> <p>1 WILSON</p> <p>2 A. It doesn't call for disclosure.</p> <p>3 It asks whether you received -- what work</p> <p>4 you did in that current semester, annual</p> <p>5 report of activities that are not part of</p> <p>6 your regular full time.</p> <p>7 Q. So it is --</p> <p>8 A. So that was --</p> <p>9 Q. So it is not disclosed on that</p> <p>10 form that you received \$10,000?</p> <p>11 A. The form doesn't ask for that.</p> <p>12 So yes.</p> <p>13 Q. Do you recall testifying at the</p> <p>14 arbitration regarding --</p> <p>15 MR. JAMES KLEIN: Can you</p> <p>16 identify the place on the form where it</p> <p>17 should be disclosed?</p> <p>18 MR. MARK KLEIN: I am not</p> <p>19 testifying here.</p> <p>20 MR. JAMES KLEIN: I mean you</p> <p>21 are saying that it is not disclosed on a</p> <p>22 form where it doesn't ask for it to be</p> <p>23 disclosed, and you're making a leap that</p> <p>24 there is no basis for.</p> <p>25 MR. MARK KLEIN: Okay.</p>
<p style="text-align: right;">Page 271</p> <p>1 WILSON</p> <p>2 that mentions UCT or BMI, and I know</p> <p>3 specifically that those were mentioned,</p> <p>4 and so I see what amounts were mentioned,</p> <p>5 but the hours were mentioned here. Yes.</p> <p>6 Here. Here it is on page -- there is no</p> <p>7 page here. Here you go. Look. It says</p> <p>8 90 hours of work, and it doesn't ask for</p> <p>9 the compensation amount, but it asks</p> <p>10 whether you did the work. That's without</p> <p>11 looking at it carefully.</p> <p>12 Q. You are looking at a form for</p> <p>13 2007, are you not, sir?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. So with respect to the</p> <p>16 form you submitted for the fall of 2010,</p> <p>17 could you find that form?</p> <p>18 A. I see it.</p> <p>19 Q. And in the fall of 2010, you</p> <p>20 just testified that you received \$10,000</p> <p>21 for the work you did for the Urban</p> <p>22 Community Teachers Project, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Is it disclosed on that form the</p> <p>25 fact that you got \$10,000 for that work?</p>	<p style="text-align: right;">Page 273</p> <p>1 WILSON</p> <p>2 Q. If you could go to the form for</p> <p>3 fall of 2010, Dr. Wilson?</p> <p>4 A. Is that this form where it says</p> <p>5 Brooklyn College ERIS at the top where I</p> <p>6 list my activities.</p> <p>7 Q. Let's start two pages</p> <p>8 beforehand.</p> <p>9 A. Okay.</p> <p>10 Q. And you signed that form on</p> <p>11 September 14, 2010, correct?</p> <p>12 A. Correct.</p> <p>13 Q. And under B a little more than</p> <p>14 half way down the page it says, "I am</p> <p>15 aware of the multiple position regulations</p> <p>16 governing activities in addition to my</p> <p>17 regular full-time employment at Brooklyn</p> <p>18 College CUNY."</p> <p>19 Do you see that?</p> <p>20 A. I see that.</p> <p>21 Q. And then you checked the box</p> <p>22 that says, "In addition to my regular</p> <p>23 full-time assignment at the college I have</p> <p>24 supplementary employment, consultative or</p> <p>25 other work for extra compensation</p>

<p style="text-align: right;">Page 274</p> <p>1 WILSON</p> <p>2 including grant-funded activities within</p> <p>3 CUNY for which complete information</p> <p>4 follows." Do you see that?</p> <p>5 A. I see that.</p> <p>6 Q. And then it says "If you check</p> <p>7 this statement, complete Section B 1."</p> <p>8 A. B 1.</p> <p>9 Q. Right.</p> <p>10 A. Right.</p> <p>11 Q. Now, if you go two pages</p> <p>12 further, do you see B 1?</p> <p>13 A. I do.</p> <p>14 Q. And it says "for current</p> <p>15 semester."</p> <p>16 A. Yes.</p> <p>17 Q. And it discloses eight hours a</p> <p>18 week, correct?</p> <p>19 A. That's correct.</p> <p>20 Q. And eight hours a week of \$64.23</p> <p>21 an hour -- I am sorry eight hours a week</p> <p>22 at \$63.24, correct?</p> <p>23 A. I don't know. Where do you see</p> <p>24 \$64.23?</p> <p>25 Q. Actually if you look at the page</p>	<p style="text-align: right;">Page 276</p> <p>1 WILSON</p> <p>2 A. Yes, that's correct.</p> <p>3 Q. And the \$10,000 is not disclosed</p> <p>4 on this form in any way, is it? Yes or</p> <p>5 no?</p> <p>6 A. No, that is not true. That is</p> <p>7 not correct because the -- first of all,</p> <p>8 you see \$8,220, so that would have</p> <p>9 constituted some of the 10,000.</p> <p>10 A. But the 10,000 didn't</p> <p>11 necessarily reflect that particular</p> <p>12 semester. It could have been two months</p> <p>13 over into the following semester. It</p> <p>14 could have been two months into the</p> <p>15 previous semester. They didn't pay you</p> <p>16 in advance. You do the work, and then</p> <p>17 they pay you, and I disclosed it.</p> <p>18 Q. Now, you testified at your</p> <p>19 arbitration that you got \$5,000 in</p> <p>20 connection with the work you did for Urban</p> <p>21 Community Teachers Project in the spring</p> <p>22 of 2010, the following semester, right?</p> <p>23 Right?</p> <p>24 A. I don't know. If that's what</p> <p>25 you have a report of, but yes.</p>
<p style="text-align: right;">Page 275</p> <p>1 WILSON</p> <p>2 before we are looking at before.</p> <p>3 A. Page B 4.</p> <p>4 MR. JAMES KLEIN: No, looking</p> <p>5 at --</p> <p>6 Q. The previous page.</p> <p>7 MR. JAMES KLEIN: The previous</p> <p>8 page before that.</p> <p>9 A. Okay.</p> <p>10 Q. Do you see a form that is titled</p> <p>11 "Instructional Staff Appointment</p> <p>12 Information"?</p> <p>13 A. Yes.</p> <p>14 Q. And three quarters or more down</p> <p>15 the page it reflects an hourly rate of</p> <p>16 \$64.23 for non-teaching time, right?</p> <p>17 A. Right.</p> <p>18 Q. For a total of \$8,221.44?</p> <p>19 A. I see that.</p> <p>20 Q. Okay. Now, you testified a</p> <p>21 little while ago that you received a total</p> <p>22 of \$10,000 in the fall of 2010 in</p> <p>23 connection with your "Administrative</p> <p>24 support for the Urban Community Teachers</p> <p>25 Program," right?</p>	<p style="text-align: right;">Page 277</p> <p>1 WILSON</p> <p>2 Q. I'll show you your testimony in</p> <p>3 a minute, but do you recall testifying to</p> <p>4 that?</p> <p>5 A. No, I don't recall testifying to</p> <p>6 that.</p> <p>7 Q. Do you remember testifying that</p> <p>8 you disclosed the receipt of the</p> <p>9 \$5,000 --</p> <p>10 A. Yes.</p> <p>11 Q. -- in the spring of 2010 on your</p> <p>12 Multiple Position Form for spring of 2010?</p> <p>13 A. I accept that I said it. I</p> <p>14 don't specifically recall it, but I accept</p> <p>15 that I said it.</p> <p>16 Q. But you also testified that</p> <p>17 you didn't see on the Multiple Position</p> <p>18 Form for the fall of 2010 disclosure of</p> <p>19 the \$10,000 you received during that</p> <p>20 semester, correct?</p> <p>21 A. It -- the issue is not when I</p> <p>22 received the money. The issue is what</p> <p>23 did the money reflect over a period of</p> <p>24 months that I worked, so it is not -- it</p> <p>25 is not when you get paid. It is for what</p>

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<p style="text-align: right;">Page 278</p> <p>1 WILSON</p> <p>2 period does it cover. There is two</p> <p>3 different questions there.</p> <p>4 MR. MARK KLEIN: I am going to</p> <p>5 ask the reporter to mark as Wilson Exhibit</p> <p>6 13 a document bearing Bates stamps DEF 143</p> <p>7 through 171.</p> <p>8 (Wilson Exhibit 13 marked for</p> <p>9 identification.)</p> <p>10 (Document handed to witness.)</p> <p>11 A. I would also point out that this</p> <p>12 is --</p> <p>13 Q. Theres no pending question, sir?</p> <p>14 A. What?</p> <p>15 Q. There is no pending question.</p> <p>16 A. Okay.</p> <p>17 MR. JAMES KLEIN: Would you</p> <p>18 like to change one of your previous</p> <p>19 answers?</p> <p>20 THE WITNESS: Yes.</p> <p>21 Q. You want to change one of your</p> <p>22 previous answers. Go ahead/?</p> <p>23 A. Yes. This form was submitted</p> <p>24 by my assistant, not by me. So it's quite</p> <p>25 possible that she was off by a few hundred</p>	<p style="text-align: right;">Page 280</p> <p>1 WILSON</p> <p>2 page 26 of Exhibit 13.</p> <p>3 A. Page 26.</p> <p>4 Q. If you see the page numbers in</p> <p>5 the lower right-hand corner.</p> <p>6 A. 13 -- no, page 10. Okay.</p> <p>7 Q. I got it.</p> <p>8 A. Page 26.</p> <p>9 Q. All right. Now, starting on</p> <p>10 page 1392 of the transcript, line 6,</p> <p>11 Ms. Nash, you know who --</p> <p>12 MR. JAMES KLEIN: Can you give</p> <p>13 me the page number again, please.</p> <p>14 MR. MARK KLEIN: Page 1392.</p> <p>15 MR. JAMES KLEIN: Yes, line 6.</p> <p>16 Q. Line 6, Ms. Nash, Rachel Nash</p> <p>17 who represented CUNY at the arbitration.</p> <p>18 A. Yes.</p> <p>19 Q. And Mr. Zwiebach was your</p> <p>20 attorney, right?</p> <p>21 A. Not my attorney. The union's</p> <p>22 attorney.</p> <p>23 Q. Okay. He was representing you,</p> <p>24 right?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 279</p> <p>1 WILSON</p> <p>2 dollars. There could have been some</p> <p>3 confusion, but certainly there was nothing</p> <p>4 intentional between the 10,000 that you</p> <p>5 mentioned and the 8200 and change that she</p> <p>6 mentioned, and then the issue of the time</p> <p>7 lag between when you did it and when you</p> <p>8 get paid and does it straddle one semester</p> <p>9 and another semester. So it is pretty</p> <p>10 complicated, and it is very easy to make a</p> <p>11 mistake, but that is the point.</p> <p>12 Q. Have you finished changing your</p> <p>13 answer, sir?</p> <p>14 A. I am finished, yes.</p> <p>15 Q. Okay. I would like to show you</p> <p>16 what has been marked as Exhibit 13, sir.</p> <p>17 That is Volume 10 from the arbitration on</p> <p>18 which you were represented by Mr.</p> <p>19 Zwiebach, correct?</p> <p>20 A. That's correct.</p> <p>21 Q. And do you recall reviewing this</p> <p>22 transcript before?</p> <p>23 A. I don't recall reviewing this,</p> <p>24 no.</p> <p>25 Q. Let me direct your attention to</p>	<p style="text-align: right;">Page 281</p> <p>1 WILSON</p> <p>2 Q. Okay. So Ms. Nash said, I am</p> <p>3 going to have to ask you to give him</p> <p>4 Exhibit 32 again, and exhibit 32 was the</p> <p>5 multiple position forms, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And we marked that as Wilson</p> <p>8 Exhibit 8 here today, correct?</p> <p>9 A. Correct.</p> <p>10 Q. And then she says: "Question:</p> <p>11 Can you please turn to the fall of 2010</p> <p>12 Multiple Position Form. Turn to the</p> <p>13 second page of that form, please.</p> <p>14 "Answer --</p> <p>15 A. You are asking me to.</p> <p>16 Q. I am reading what is written</p> <p>17 here.</p> <p>18 A. Okay.</p> <p>19 Q. "Question: You indicated eight</p> <p>20 hours a week for ERIS, right?</p> <p>21 "Answer: Right.</p> <p>22 "Question: And that is for</p> <p>23 September to December 2010, right?</p> <p>24 "Answer: Right.</p> <p>25 "Question: And if you turn to</p>

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1 WILSON
2 the next page, that is an important -- an
3 appointment form, right?"
4 A. Hold on. You lost me. The
5 next page meaning -- Okay.
6 Q. I am just reading what is typed
7 here.
8 A. Yes, I know.
9 MR. JAMES KLEIN: When she says
10 next page in the transcript, she is
11 referring to the multiple position report.
12 Q. She is referring to the first
13 page of Exhibit 32.
14 MR. JAMES KLEIN: The fall 2010
15 multiple position report.
16 Q. So I will repeat that.
17 "Question: And if you turn to
18 the next page, that is an appointment
19 form, right?"
20 "Answer: Nonteaching adjunct
21 appointment, yes." And by the way where
22 ever it says answer A, that is what you
23 testified to, correct?
24 A. Correct.
25 Q. "Question: And it is for

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1 WILSON
2 September 2010 to December 2010 you see
3 down about three quarters of the way down?
4 "Answer: Yes.
5 "Question: It says your hourly
6 rate is \$60 an hour, right?
7 "Answer: Right.
8 "Question: And it lists a total
9 of 128 hours, right?
10 "Answer: That's right.
11 "Question: For \$8,221, right?
12 "Answer: Correct.
13 "Question: And that corresponds
14 to the eight hours a week that you
15 disclosed on your Multiple Position Form,
16 right?
17 "Answer: I think so. Yes.
18 Yes. That is right.
19 "Question: Now, in the fall of
20 2010, you also got \$10,000 from the Schott
21 Foundation grant, didn't you?"
22 And then going up to the top of
23 page 1394 "Answer: Yes.
24 "Question: How was that
25 disclosed on this form?

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1 WILSON
2 "Answer: I don't know.
3 "Question: And that is for UCT,
4 right?
5 "Answer: That's correct.
6 "Question: So in fact you did
7 not disclose your UCT payments on your
8 multiple position forms, did you?
9 "Answer: I don't see it here.
10 "Question: Now, you've got
11 5,000 from the Schott Foundation in the
12 spring of 2010. Do you recall that?
13 "Answer: Yes.
14 "Question: We actually don't
15 have your spring 2010 form. It's your
16 position that you disclosed that on your
17 spring 2010 form?
18 "Answer: I believe so, yes.
19 "Question: But not on your 2010
20 form.
21 "Answer: Apparently not."
22 Dr. Wilson, did you give those
23 answers to those questions at your
24 arbitration on June 19, 2015?
25 A. Yes.

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1 WILSON
2 Q. By the way, there was a
3 reference to ERIS, E-R-I-S, right, in the
4 testimony we just read?
5 A. In this testimony?
6 Q. Yes.
7 A. The arbitration, yes.
8 Q. And what was ERIS?
9 A. It was the Black Male Initiative
10 Program at Brooklyn College.
11 Q. And that was the acronym, all
12 capital letters ERIS?
13 A. Yes.
14 Q. What did ERIS stand for?
15 A. I would have to refresh my
16 memory on that, Empower Respect Initiative
17 Empower respect improve -- I have to go
18 back over the acronym.
19 MR. MARK KLEIN: I am going to
20 ask the reporter to mark as Wilson Exhibit
21 14 a document bearing Bates stamps DEF
22 00650 and 651.
23 (Wilson Exhibit 14 marked for
24 identification.)
25 (Document handed to witness.)

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<p style="text-align: right;">Page 286</p> <p>1 WILSON</p> <p>2 Q. Dr. Wilson, I show you what has</p> <p>3 been marked as Wilson Exhibit 14. Please</p> <p>4 take a moment to review this and tell me</p> <p>5 when you have done so.</p> <p>6 (Pause.)</p> <p>7 A. Yes, I see that.</p> <p>8 Q. It is two pages. Have you</p> <p>9 reviewed both pages?</p> <p>10 A. Yes, I see that.</p> <p>11 Q. Do you recall seeing this series</p> <p>12 of e-mails, this e-mail chain?</p> <p>13 A. I see that I received them. I</p> <p>14 actually don't recall them, but I see that</p> <p>15 I received them.</p> <p>16 Q. Do you recall this was an</p> <p>17 exhibit at your arbitration at which you</p> <p>18 were represented by Mr. Zwiebach?</p> <p>19 A. I do vaguely, but not really</p> <p>20 actually I have to say.</p> <p>21 Q. This e-mail chain relates to a</p> <p>22 check for a \$150,000 from the Deutsche</p> <p>23 Bank Americas Foundation for a one-year</p> <p>24 grant for the UCT program, correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 288</p> <p>1 WILSON</p> <p>2 approved by the School of Education, so --</p> <p>3 Q. Did you ever --</p> <p>4 A. So it may not have been in this</p> <p>5 letter, but it was known by the college.</p> <p>6 Q. Did you ever disclose to anyone</p> <p>7 that you were receiving monies from the</p> <p>8 Brooklyn Foundation bank account that</p> <p>9 housed the 150,000 dollar grant?</p> <p>10 A. I couldn't have been paid</p> <p>11 without the college drawing up contracts</p> <p>12 and approving including the top financial</p> <p>13 officers who approved it and the president</p> <p>14 and the provost who would review it. So</p> <p>15 yes, so I didn't have to disclose it.</p> <p>16 They knew it in advance, and they approved</p> <p>17 it.</p> <p>18 Q. Now, in response to the second</p> <p>19 page is an e-mail from Stephanie Ehrlich</p> <p>20 to Noah Anderson, Emily Gavel, and you,</p> <p>21 correct?</p> <p>22 A. Correct.</p> <p>23 Q. And on the first page Mr.</p> <p>24 Anderson responds to Stephanie Ehrlich's</p> <p>25 e-mail, right?</p>
<p style="text-align: right;">Page 287</p> <p>1 WILSON</p> <p>2 Q. And who is Stephanie Ehrlich,</p> <p>3 E-H-R-L-I-C-H?</p> <p>4 A. I believe she worked with the</p> <p>5 Brooklyn College Foundation as a grant</p> <p>6 administrator, you know, with knowledge</p> <p>7 and expertise in these areas. That is my</p> <p>8 recollection. I am not sure if I ever</p> <p>9 met her. Maybe I did. I don't know.</p> <p>10 Q. And Ms. Ehrlich is asking some</p> <p>11 questions of Mr. Anderson regarding how</p> <p>12 the Deutsche Bank Foundation check is</p> <p>13 going to be spent, right?</p> <p>14 A. That's correct.</p> <p>15 Q. And do you see anywhere in Mr.</p> <p>16 Anderson's response to Ms. Ehrlich that he</p> <p>17 mentions that you and he would be a</p> <p>18 recipient of the funds that were part of</p> <p>19 the 150,000 dollar grant from the Deutsche</p> <p>20 Bank Americas Foundation?</p> <p>21 A. My understanding is it wouldn't</p> <p>22 necessarily be in this letter, but it</p> <p>23 would have been in the administrative</p> <p>24 category of the foundation application</p> <p>25 that was approved by the college and</p>	<p style="text-align: right;">Page 289</p> <p>1 WILSON</p> <p>2 A. On the first page he</p> <p>3 responds -- you mean on the second page?</p> <p>4 Q. No. The first page of Exhibit</p> <p>5 14 contains an e-mail from Mr. Anderson to</p> <p>6 Stephanie Ehrlich?</p> <p>7 A. Yes, I see it.</p> <p>8 Q. This was sent on Tuesday, August</p> <p>9 23, 2011 at 18:53 military time?</p> <p>10 A. I see that. Yes.</p> <p>11 Q. And then you respond to Mr.</p> <p>12 Anderson at the top of the first page,</p> <p>13 right?</p> <p>14 A. Yes.</p> <p>15 Q. And you wrote you roll'in G,"</p> <p>16 R-O-L-L 'I-N G dash "money," M-O-N-E-Y?</p> <p>17 A. Correct.</p> <p>18 Q. What do you mean when you wrote</p> <p>19 you roll'in G-money?</p> <p>20 A. Essentially congratulations.</p> <p>21 You are doing great work for getting the</p> <p>22 grant.</p> <p>23 Q. Does G-money mean gangster</p> <p>24 money?</p> <p>25 A. No, it means you are getting</p>

73 (Pages 286 - 289)

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1 WILSON
2 thousands of dollars. G doesn't mean
3 gangster.
4 Q. Okay.
5 A. And just to clarify because you
6 asked me the question this is African
7 American vernacular, and it is not to be
8 inferred with any criminal or subversive
9 intent. I just need point that out to
10 you.
11 Q. Okay.
12 MR. MARK KLEIN: I am going to
13 ask the reporter to mark as Exhibit 15
14 --
15 A. I am kind of getting lost in all
16 these documents. Which ones are we
17 focusing on?
18 Q. At the moment you don't have to
19 worry about any of these.
20 A. What about this one?
21 Q. Put it here/?
22 A. This one?
23 Q. No.
24 MR. MARK KLEIN: I am going to
25 ask the reporter to mark as Wilson Exhibit

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1 WILSON
2 15 a document that was Bates stamped DEF
3 957 through 980. In the copying the Bates
4 stamped didn't show up. It is a document
5 that was marked as CUNY 91 at the
6 arbitration.
7 (Wilson Exhibit 15 marked for
8 identification.)
9 (Document handed to witness.)
10 Q. Dr. Wilson, I show you what has
11 been marked as Wilson Exhibit 15. Please
12 review this quickly and tell me whether
13 you have ever seen it before.
14 A. What was your question?
15 Q. Just review this and tell me
16 when you have done so.
17 (Pause.)
18 MR. JAMES KLEIN: Will I
19 receive a copy of all these exhibits or
20 are these my copies to take?
21 MR. MARK KLEIN: These are your
22 copies to take.
23 MR. JAMES KLEIN: And will I
24 have the marked copies, so I know what
25 exhibit numbers they are? Can I get copies

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1 WILSON
2 of the marked copies?
3 MR. MARK KLEIN: We can talk
4 about that later. Yes.
5 A. All right.
6 Q. Just tell me when you have
7 reviewed Exhibit 15, sir.
8 A. Well, I note that there are
9 several pages of e-mails. So I am just
10 trying to read through all of them here.
11 (Pause.)
12 Q. I will direct you to particular
13 parts, but just tell me when you have
14 looked through this.
15 A. Okay.
16 (Pause.)
17 A. Yes, I -- let me get to the last
18 page. Hold on.
19 Q. Okay.
20 A. Yes, I see that now.
21 Q. Okay. Do you recall seeing
22 this exhibit during the arbitration at
23 which you were represented by Mr.
24 Zwiebach?
25 A. No.

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1 WILSON
2 Q. Let me direct your attention to
3 the bottom of the second page of Exhibit
4 15, an e-mail from Marjorie Lewis to you
5 on January 14, 2010?
6 A. Yes.
7 Q. And the e-mail says "Dear
8 Professor Wilson, we received your payment
9 request," and it gives a number for
10 \$309.84 on an account number which it
11 identifies, right?
12 A. Yes.
13 Q. And then she says we cannot
14 process this payment because PSC dash CUNY
15 awards do not support iPod, and you
16 purchased an iPod for \$179 from the Apple
17 store on December 19, 2009?
18 A. That's correct.
19 Q. And you made this request for
20 payment from the research foundation,
21 right?
22 A. That's correct.
23 Q. And Marjorie Lewis worked at the
24 research foundation?
25 A. Yes, she did.


<p style="text-align: right;">Page 294</p> <p>1 WILSON</p> <p>2 Q. Okay. Then you submitted -- I'm</p> <p>3 sorry. That e-mail was on January 14,</p> <p>4 correct?</p> <p>5 A. Correct.</p> <p>6 Q. Now, on January 17 --</p> <p>7 A. Where do you see January 17?</p> <p>8 Q. On the first page of Exhibit 15.</p> <p>9 A. Okay.</p> <p>10 Q. It is an e-mail from you to</p> <p>11 Annie London, right, toward the bottom of</p> <p>12 the page?</p> <p>13 A. Yes.</p> <p>14 Q. And Annie London was your</p> <p>15 assistant at the graduate center?</p> <p>16 A. That's correct.</p> <p>17 Q. And you copied yourself and Mr.</p> <p>18 Anderson, correct?</p> <p>19 A. That's correct.</p> <p>20 Q. And your e-mail says "Annie no</p> <p>21 wants a Macbook with all the bells and</p> <p>22 whistles, and for his office I assume Noah</p> <p>23 wants a laser color copier. We will also</p> <p>24 need a Dell laptop for Amber, new staff</p> <p>25 person. Funding is from BC Foundation -</p>	<p style="text-align: right;">Page 296</p> <p>1 WILSON</p> <p>2 Q. Okay.</p> <p>3 A. Who didn't have a computer.</p> <p>4 Q. And you said you -- it also says</p> <p>5 in this e-mail, "I may want the new Apple</p> <p>6 iTouch." Right?</p> <p>7 A. That's correct.</p> <p>8 Q. And then it says "Order two</p> <p>9 Kidels." Did you mean Kindels from</p> <p>10 Amazon?</p> <p>11 A. Probably Kindels. That's</p> <p>12 correct.</p> <p>13 Q. Who was that supposed to be for?</p> <p>14 A. I don't recall at the time.</p> <p>15 Maybe one for me and one for Annie. I am</p> <p>16 not sure.</p> <p>17 Q. And payment for all these things</p> <p>18 were supposed to come out BC Foundation</p> <p>19 Deutsche Bank grant account, right?</p> <p>20 A. Apparently. Yes.</p> <p>21 Q. And did you receive those or any</p> <p>22 of them?</p> <p>23 A. Me, no. Noah received the</p> <p>24 Macbook I believe. I don't know actually</p> <p>25 what he received, but -- so I didn't get</p>
<p style="text-align: right;">Page 295</p> <p>1 WILSON</p> <p>2 Deutsche Bank grant," right?</p> <p>3 A. Yes.</p> <p>4 Q. BC Foundation Deutsche Bank</p> <p>5 Grant was the grant for the United</p> <p>6 Community Teachers Program?</p> <p>7 A. Urban Community.</p> <p>8 Q. Urban Community Teachers</p> <p>9 Program. Thank you. Right?</p> <p>10 A. Correct.</p> <p>11 Q. And you were asking Ms. London</p> <p>12 to purchase for you -- for Mr. Anderson a</p> <p>13 Macbook with all the bells and whistles</p> <p>14 and a printer?</p> <p>15 A. Correct.</p> <p>16 Q. A laser jet printer?</p> <p>17 A. That's right.</p> <p>18 Q. And a Dell laptop for Amber, a</p> <p>19 new staff person, right?</p> <p>20 A. Right.</p> <p>21 Q. Who was Amber?</p> <p>22 A. Amber was a staff person who was</p> <p>23 assigned -- she was actually a doctoral</p> <p>24 student working with our students in the</p> <p>25 program.</p>	<p style="text-align: right;">Page 297</p> <p>1 WILSON</p> <p>2 Amber's -- you asked me if I received</p> <p>3 these. I didn't receive Amber's laptop.</p> <p>4 Q. Did you get an Apple iTouch?</p> <p>5 A. I am not sure.</p> <p>6 Q. All right. But you --</p> <p>7 A. I am not even sure what an Apple</p> <p>8 iTouch is to tell you the truth, so I am</p> <p>9 not sure if I got an Apple iTouch. If it</p> <p>10 is an iPad, I am not positive. I don't</p> <p>11 know what an iTouch is, and that is what I</p> <p>12 wrote. Maybe I meant iPad. I don't</p> <p>13 know.</p> <p>14 Q. In any event you instructed</p> <p>15 Annie London your assistant to purchase</p> <p>16 these things using funding from BC</p> <p>17 Foundation Deutsche Bank Grant Fund?</p> <p>18 A. Yes, I did. Yes.</p> <p>19 MR. MARK KLEIN: Okay. It is</p> <p>20 5:21. Why don't we break for the day.</p> <p>21 What time do you want to start tomorrow,</p> <p>22 9:30 or 10?</p> <p>23 MR. JAMES KLEIN: Our</p> <p>24 preference would be 10.</p> <p>25 THE WITNESS: 10 would be fine.</p>

75 (Pages 294 - 297)

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1 WILSON
2 MR. MARK KLEIN: Okay. Let's
3 start at 10.
4 (Time noted: 5:20 p.m.)
5
6
7
8
9
10
11 JOSEPH WILSON, PhD
12
13 Subscribed and sworn to before me
14 this day of , 2019
15
16
17
18
19
20
21
22
23
24
25

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1 WILSON
2 CERTIFICATION
3
4
5
6 I, DEBBIE ZAROMATIDIS, a Shorthand
7 Reporter and a Notary Public, do hereby
8 certify that the foregoing witness, JOSEPH
9 WILSON, PhD, was duly sworn on the date
10 indicated, and that the foregoing is a
11 true and accurate transcription of my
12 stenographic notes.
13 I further certify that I am not
14 employed by nor related to any party to
15 this action.
16
17
18
19
20
21 
22
23 DEBBIE ZAROMATIDIS
24
25

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3	VERITEXT/NEW YORK REPORTING, LLC
4	CASE NAME: WILSON V. CUNY
5	DATE OF DEPOSITION: JANUARY 29, 2019
6	WITNESSES' NAME: JOSEPH WILSON, PhD
7	PAGE LINE CHANGE REASON
8	
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16	
17	
18	
19	
20	JOSEPH WILSON, PhD
21	SUBSCRIBED AND SWORN TO BEFORE ME
22	THIS ____ DAY OF _____, 2019.
23	
24	(NOTARY PUBLIC)
25	MY COMMISSION EXPIRES:

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2016. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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